

# EXHIBIT F

## PART 2



Adlife Marketing & Communications Co., Inc.  
38 Church St • Pawtucket, RI 02860  
Phone: (401) 723-4782

**Re: Claim Number: 4326406162212721900**  
**FRE 408 SETTLEMENT COMMUNICATION**

Thursday, May 2, 2019

**Buffalo Run Ranch**

4611 E Bench Creek Rd  
Woodland, UT 84036

Dear Buffalo Run Ranch,

You are receiving this correspondence because you may have used the attached image unlawfully.

The image in question is owned by Adlife Marketing & Communications Co., Inc. and was discovered on your website. This image is part of our library of images protected under copyright. Attached is a copy of the image, pertinent information regarding Adlife's proof of ownership, along with the usage of this image on your company's website. If you have a license, please contact us immediately with a copy of that license at [licensing@adlife.com](mailto:licensing@adlife.com).

The use of a copyrighted image without the valid licensing in place is copyright infringement and is in violation of U.S. Copyright law, Title 17 of the United States Code. The purpose of this correspondence is to confirm a previously purchased license for the use of the image OR reach a fair settlement.

**If a valid license was purchased for the use of the image:** Please provide Adlife a copy of the purchase receipt. In most cases, you can access your download history from the stock image website which was used. A screenshot indicating when the image was purchased, and from whom, will suffice. Any and all valid license information can be forwarded to [licensing@adlife.com](mailto:licensing@adlife.com).

**If you know a valid license for this image does NOT exist:** You must immediately cease and desist the use of this image and remove it from any promotional and/or advertising usage in any and all media. Attached is information whereby you have the ability to purchase retroactive licensing rights for the image in question, for the amount of **\$8,000.00**, which will abate and eliminate any liability associated with the past unlawful use of said image. To avoid further action, such as possible litigation in Federal Court, it is recommended that you contact us at your earliest convenience.

It is important that you understand that just removing the image from your company's website does not release you from any potential liability associated with the unlawful use of the image. The Adlife Licensing Department is willing to discuss the matter and the circumstances surrounding the use of the image. However, Adlife expects to be compensated for the use of the image in question if not properly licensed. If, after settling the issue of the unlawful use of this image in the past, you are interested in continuing to use the image, the Adlife Licensing Department will assist you in obtaining the proper license for all **future** use.

Please note that your failure to respond to this notice may result in further legal action. If you believe this letter has reached you in error, please contact Adlife Licensing Department at [licensing@adlife.com](mailto:licensing@adlife.com). This letter is without prejudice to Adlife's rights and remedies, all of which are expressly reserved.

We look forward to your prompt response to this matter.

Sincerely,

Rebecca M. Jones  
Adlife Licensing Department  
401-543-7553

PreparedFoods\_000001



Adlife Marketing & Communications Co., Inc.  
38 Church St • Pawtucket, RI 02860  
Phone: (401) 723-4782

Re: Claim Number: 4326406162212721900  
FRE 408 SETTLEMENT COMMUNICATION

Thursday, May 2, 2019

### Company Name

Buffalo Run Ranch

### Company Address

4611 E Bench Creek Rd  
Woodland, UT 84036

### Company Phone Number

435-200-9360

### URL Containing Image

<https://buffalorunranch.com/>

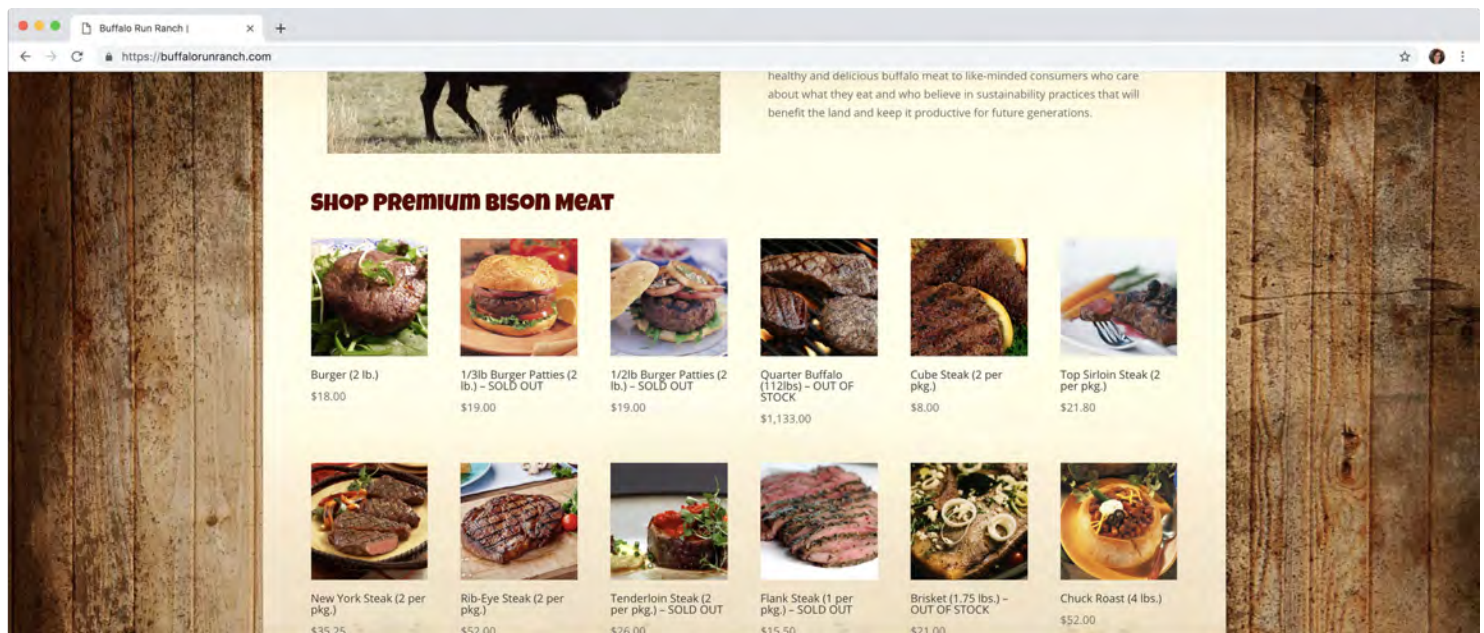


### Image Name

BeefCubeSteakGrIMrk001

### Registration Number

VA0002012581





Adlife Marketing & Communications Co., Inc.  
38 Church St • Pawtucket, RI 02860  
Phone: (401) 723-4782

**Re: Claim Number: 4326407502212033489**  
**FRE 408 SETTLEMENT COMMUNICATION**

Thursday, May 2, 2019

**Buffalo Run Ranch**

4611 E Bench Creek Rd  
Woodland, UT 84036

Dear Buffalo Run Ranch,

You are receiving this correspondence because you may have used the attached image unlawfully.

The image in question is owned by Adlife Marketing & Communications Co., Inc. and was discovered on your website. This image is part of our library of images protected under copyright. Attached is a copy of the image, pertinent information regarding Adlife's proof of ownership, along with the usage of this image on your company's website. If you have a license, please contact us immediately with a copy of that license at [licensing@adlife.com](mailto:licensing@adlife.com).

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We look forward to your prompt response to this matter.

Sincerely,

Rebecca M. Jones  
Adlife Licensing Department  
401-543-7553

PreparedFoods\_000003





Adlife Marketing & Communications Co., Inc.  
38 Church St • Pawtucket, RI 02860  
Phone: (401) 723-4782

Re: Claim Number: 4326407502212033489  
FRE 408 SETTLEMENT COMMUNICATION

Thursday, May 2, 2019

### Company Name

Buffalo Run Ranch

### Company Address

4611 E Bench Creek Rd  
Woodland, UT 84036

### Company Phone Number

435-200-9360

### URL Containing Image

<https://buffalorunranch.com/product-category/steaks>

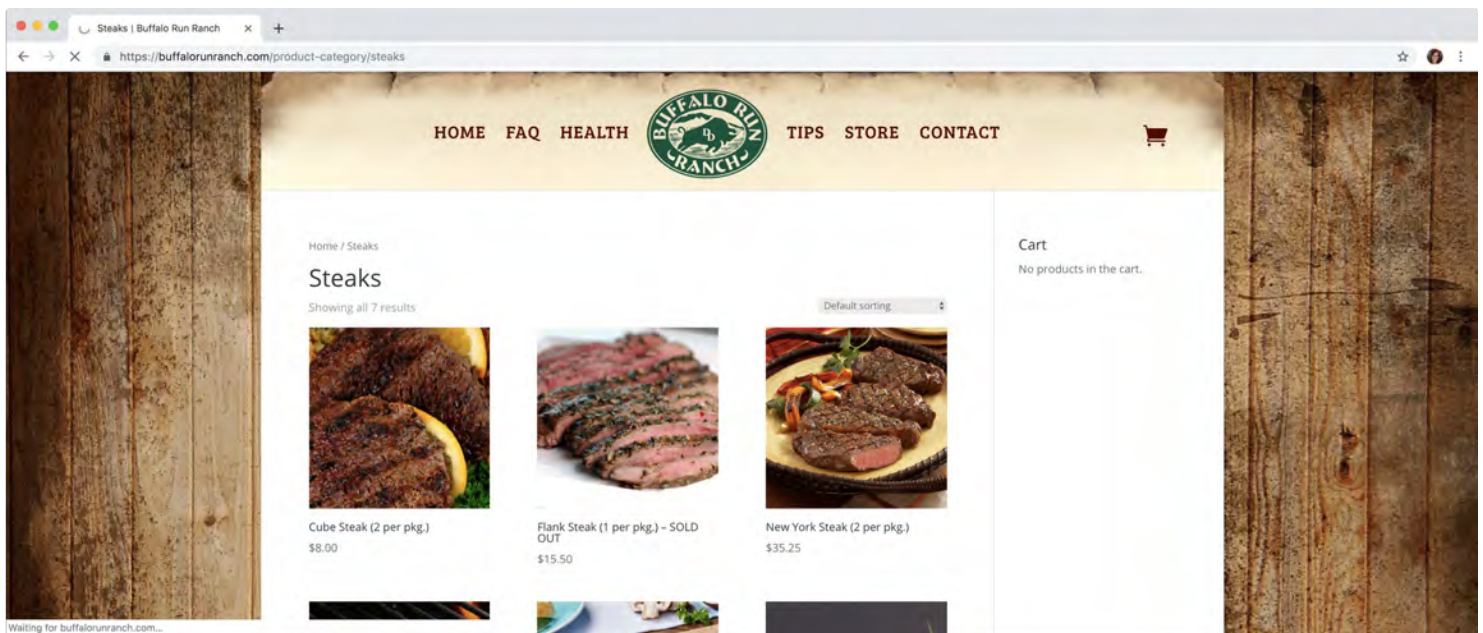


### Image Name

BeefCubeSteakGrIMrk001

### Registration Number

VA0002012581





Adlife Marketing & Communications Co., Inc.  
38 Church St • Pawtucket, RI 02860  
Phone: (401) 723-4782

Re: Claim Number: 4333239250831257821  
FRE 408 SETTLEMENT COMMUNICATION

Friday, May 10, 2019

**Meridian Magazine**

409 N. Country Manor Lane  
Alpine, UT 84004.

Dear Meridian Magazine,

You are receiving this correspondence because you may have used the attached image unlawfully.

The image in question is owned by Adlife Marketing & Communications Co., Inc. and was discovered on your website. This image is part of our library of images protected under copyright. Attached is a copy of the image, pertinent information regarding Adlife's proof of ownership, along with the usage of this image on your company's website. If you have a license, please contact us immediately with a copy of that license at [licensing@adlife.com](mailto:licensing@adlife.com).

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We look forward to your prompt response to this matter.

Sincerely,

A handwritten signature in black ink that reads "David W. Higgins".

David W. Higgins  
Adlife Licensing Department  
617-775-3289

PreparedFoods\_000005



Adlife Marketing & Communications Co., Inc.  
38 Church St • Pawtucket, RI 02860  
Phone: (401) 723-4782

Re: Claim Number: 4333239250831257821  
FRE 408 SETTLEMENT COMMUNICATION

Friday, May 10, 2019

## Company Name

Meridian Magazine

## Company Address

409 N. Country Manor  
Lane Alpine, UT 84004.

## Company Phone Number

202-714-5775

## URL Containing Image

<https://latterdaysaintmag.com/article-1-14809/>



## Image Name


PotatoAsst001\_ADL

## Registration Number

VA0002033004


→ ↻ Secure | <https://latterdaysaintmag.com/article-1-14809/> ☆


slices before baking. We used that as a starting point. We made several casseroles by boiling the potato slices until they were crisp tender and assembling them in baking dishes. We were disappointed. The casseroles turned out with over-cooked, mushy potatoes. They tasted bland and the casseroles were watery. We concluded that the boiling bleached out much of the potato flavor and the water diluted the casseroles. We found that if we sliced the potatoes thinly — about 1/8-inch or a little thicker—they would cook evenly without par cooking.





It's important that you slice the potatoes uniformly. If you don't, your casserole won't cook evenly: the thin slices will be mushy while the thick slices will be hard. The only way to cut the slices evenly is with a mechanical slicer. Our slicer of choice is a mandoline.


*By Maurine Proctor*

 Fine-Tuning: Church Updates Guidelines for New Hymnbook and Children's Songbook Submissions  
*By Official Church Newsroom*

 What Do We Know About the "Anthon Transcript"?  
*By Book of Mormon Central*

 "You Are Enough": New Church Video Celebrates Mothers  
*By Church of Jesus Christ of Latter-day Saints*

 How the Impossible Became Possible: "Close up" picture finally taken of massive black hole  
*By Ronald P. Millett*

 Cartoon: Mother's





Adlife Marketing & Communications Co., Inc.  
38 Church St • Pawtucket, RI 02860  
Phone: (401) 723-4782

Re: Claim Number: 4458764402212268911  
FRE 408 SETTLEMENT COMMUNICATION

Wednesday, October 2, 2019

**Company Name**

Caley's Catering & Events

**Company Address**

PO Box 104  
Draper, Utah 84020

**Company Phone Number**

801-231-5250

**URL Containing Image**

<https://caleyscatering.com/lite-menu-options/>

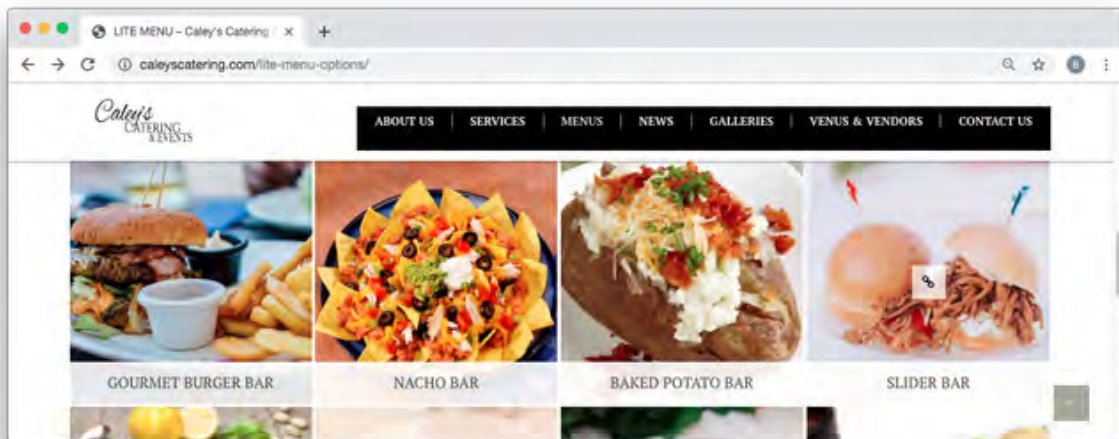


**Image Name**

PotatoBaked013

**Registration Number**

VA0002019412







Adlife Marketing & Communications Co., Inc.  
38 Church St • Pawtucket, RI 02860  
Phone: (401) 723-4782

Re: Claim Number: 4475837350836351913  
FRE 408 SETTLEMENT COMMUNICATION

Tuesday, October 22, 2019

**Company Name**

ACR International, LLC

**Company Address**

223 West 1230 North #102  
Provo, Utah 84604

**Company Phone Number**

(855) 648-1230

**URL Containing Image**

<https://www.acrllc.com/freerecipes.html>

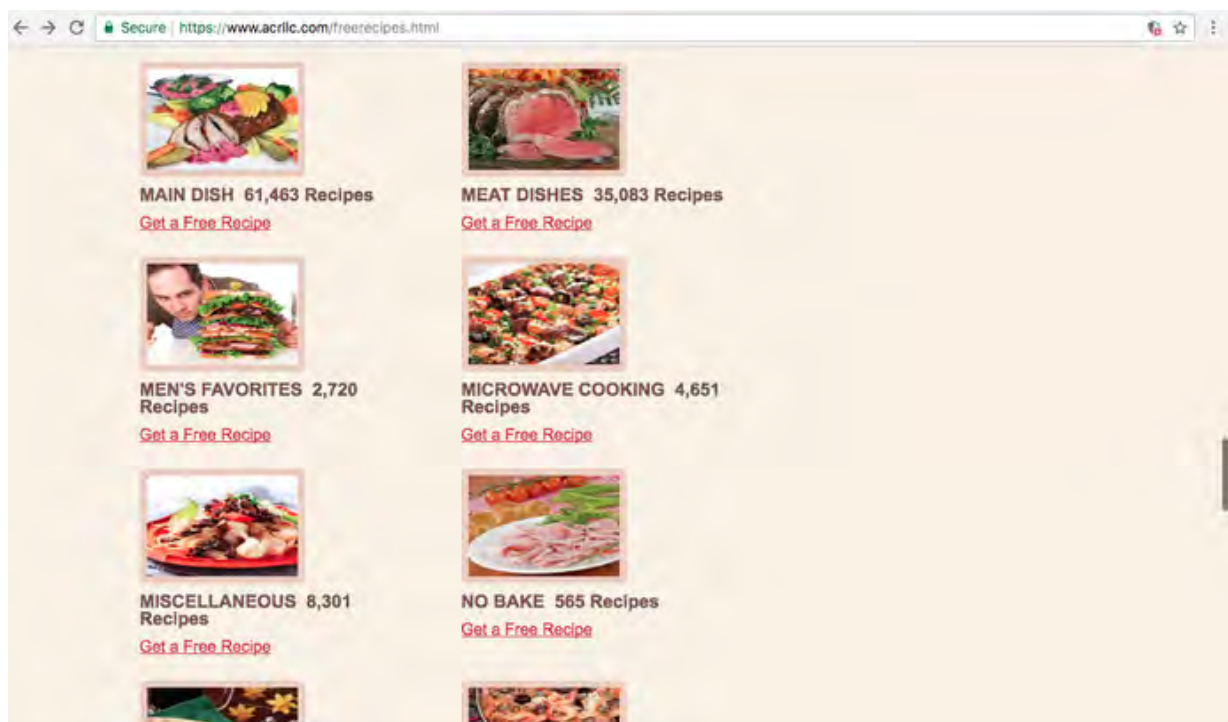


**Image Name**

BeefRibRoast004.jpg

**Registration Number**

VA0002009665





Adlife Marketing & Communications Co., Inc.  
38 Church St • Pawtucket, RI 02860  
Phone: (401) 723-4782

Re: Claim Number: 4791969350837067739  
FRE 408 SETTLEMENT COMMUNICATION

Thursday, October 22, 2020

**Company Name**

Lee's Marketplace

**Company Address**

555 E 1400 N  
Logan, UT 84341

**Company Phone Number**

(435) 755-5100

**URL Containing Image**

<https://digitalcommons.usu.edu/cgi/viewcontent.cgi?article=1080&context=newspapers>



**Image Name**

Carrots0409.

**Registration Number**

VA0002023644





PreparedFoodPhotos.com  
P.O. Box 1000 • Slatersville, RI. 02876  
licensing@PreparedFoodPhotos.com  
1-866-609-1548

Re: Claim Number: 4928247536832078598  
FRE 408 SETTLEMENT COMMUNICATION

Monday, March 29, 2021

**Company Name**

Big Daddy's Direct

**Company Address**

45 E 300 N  
Monroe, UT 84754

**Company Phone Number**

(435) 231-1319

**URL Containing Image**

<https://www.facebook.com/Big-Daddys-Direct-Cedar-City-Utah-106257547691122/>

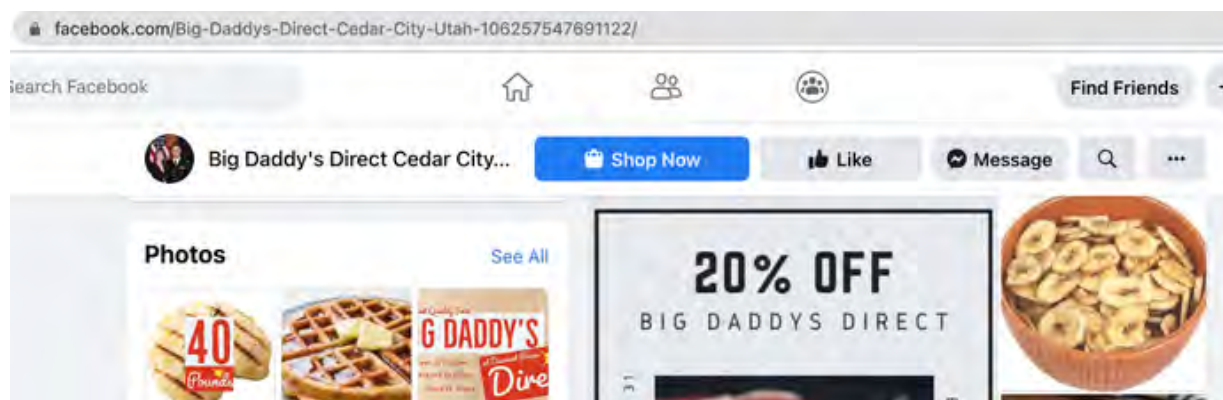


**Image Name**

BananaChipsHR0611.

**Registration Number**

VA0002024712





PreparedFoodPhotos.com  
P.O. Box 1000 • Slatersville, RI. 02876  
licensing@PreparedFoodPhotos.com  
1-866-609-1548

Re: Claim Number: 5075335546834507023  
FRE 408 SETTLEMENT COMMUNICATION

Wednesday, September 15, 2021

**Company Name**

Utah Education Network

**Company Address**

101 Wasatch Drive  
Salt Lake City, UT 84112

**Company Phone Number**

(801) 585-6013

**URL Containing Image**

<https://www.uen.org/tv/cheese/>



**Image Name**

CheeseGouda004\_ADL

**Registration Number**

VA0002027767







PreparedFoodPhotos.com  
P.O. Box 1000 • Slatersville, RI. 02876  
licensing@PreparedFoodPhotos.com  
1-866-609-1548

Re: Claim Number: 5088329106838228340  
FRE 408 SETTLEMENT COMMUNICATION

Thursday, September 30, 2021

**Company Name**

Intermountain Healthcare

**Company Address**

36 S State Street  
Salt Lake City, Utah 84111

**Company Phone Number**

(801) 442-3430

**URL Containing Image**

<https://intermountainhealthcare.org/blogs/topics/live-well/2013/11/what-could-you-eat-if-you-didnt-have-that-drink/>



**Image Name**

CheeseBall004

**Registration Number**

VA0002014921





PreparedFoodPhotos.com  
P.O. Box 1000 • Slatersville, RI. 02876  
licensing@PreparedFoodPhotos.com  
1-866-609-1548

Re: Claim Number: 5135669566612740464  
FRE 408 SETTLEMENT COMMUNICATION

Wednesday, November 24, 2021

**Company Name**

University of Utah Health

**Company Address**

50 North Medical Drive  
Salt Lake City, UT 84132

**Company Phone Number**

801-581-2121

**URL Containing Image**

<https://healthcare.utah.edu/healthfeed/postings/2015/04/>



**Image Name**

PizzaBites002.

**Registration Number**

VA0002017741





PreparedFoodPhotos.com  
P.O. Box 1000 • Slatersville, RI. 02876  
licensing@PreparedFoodPhotos.com  
1-866-609-1548

Re: Claim Number: 5140229336214057146  
FRE 408 SETTLEMENT COMMUNICATION

Monday, November 29, 2021

**Company Name**

Dry Lakes Ranch Beef

**Company Address**

73 North Main Street  
PO Box 1561  
Parowan, Utah 84761

**Company Phone Number**

435-559-1561

**URL Containing Image**

<https://www.drylakesranchbeef.com/product-page/boneless-chuck-roast>



**Image Name**

BeefChuckRoastBnls001.jpg

**Registration Number**

VA0002022602

https://www.drylakesranchbeef.

Apple iCloud Yahoo Bing Wikipedia Facebook Twitter LinkedIn

**Dry Lakes Ranch Beef** Home Buy in Bulk  w Dry Cattle Know Yo

Home / Boneless Chuck Roast (3 sizes available)



Welcome.

Sold by the pound, boneless Chuck Roasts are tender, flavorful, and moist.





PreparedFoodPhotos.com  
P.O. Box 1000 • Slatersville, RI. 02876  
licensing@PreparedFoodPhotos.com  
1-866-609-1548

Re: Claim Number: 5172026536613300077  
FRE 408 SETTLEMENT COMMUNICATION

Wednesday, January 5, 2022

**Company Name**

The Company Grill

**Company Address**

5185 Frontier Dr,  
Mountain Green, Utah, 84050

**Company Phone Number**

(801) 309-0952

**URL Containing Image**

<https://companygrill.com/memphis-style-bbq/>

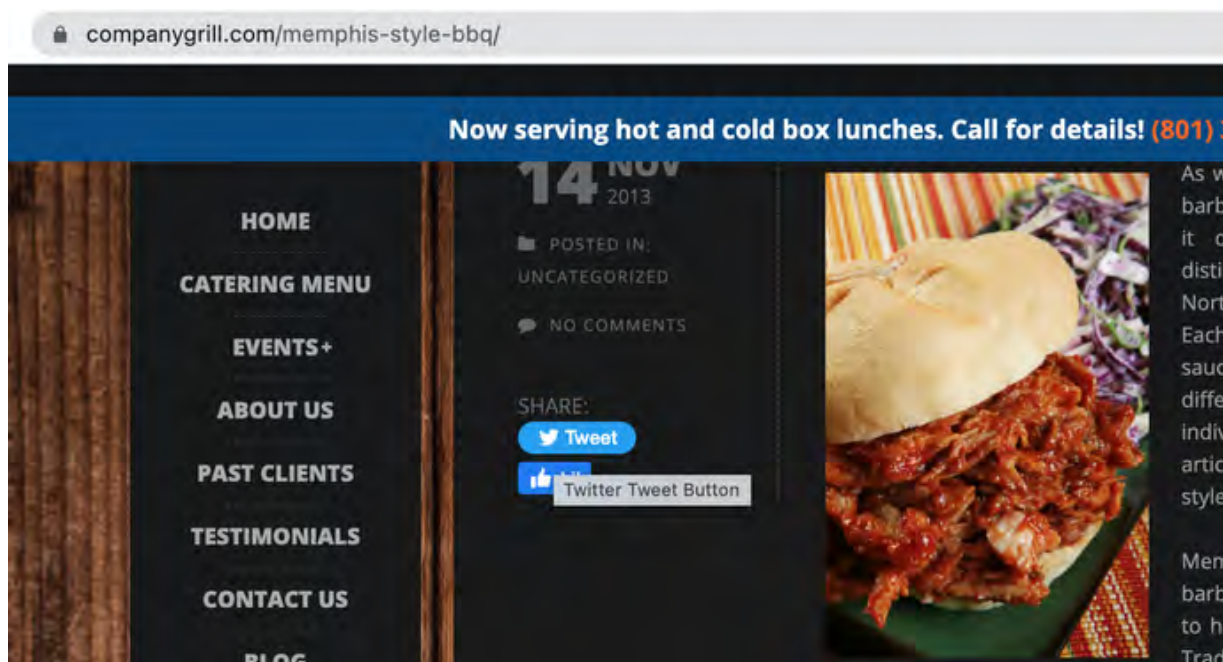


**Image Name**

ChickenSandwichBBQ002.

**Registration Number**

VA0002015841







PreparedFoodPhotos.com  
P.O. Box 1000 • Slatersville, RI. 02876  
licensing@PreparedFoodPhotos.com  
1-866-609-1548

Re: Claim Number: 5347336666617401650  
FRE 408 SETTLEMENT COMMUNICATION

Wednesday, July 27, 2022

**Company Name**

NUTRIEX, LLC

**Company Address**

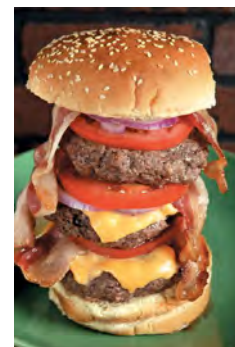
1055 East 2100 South, Suite 203  
Salt Lake City, Utah 84106

**Company Phone Number**

888-(688-7439)

**URL Containing Image**

<https://nutriex.com/nutriex-insights/cancer-prevention/>

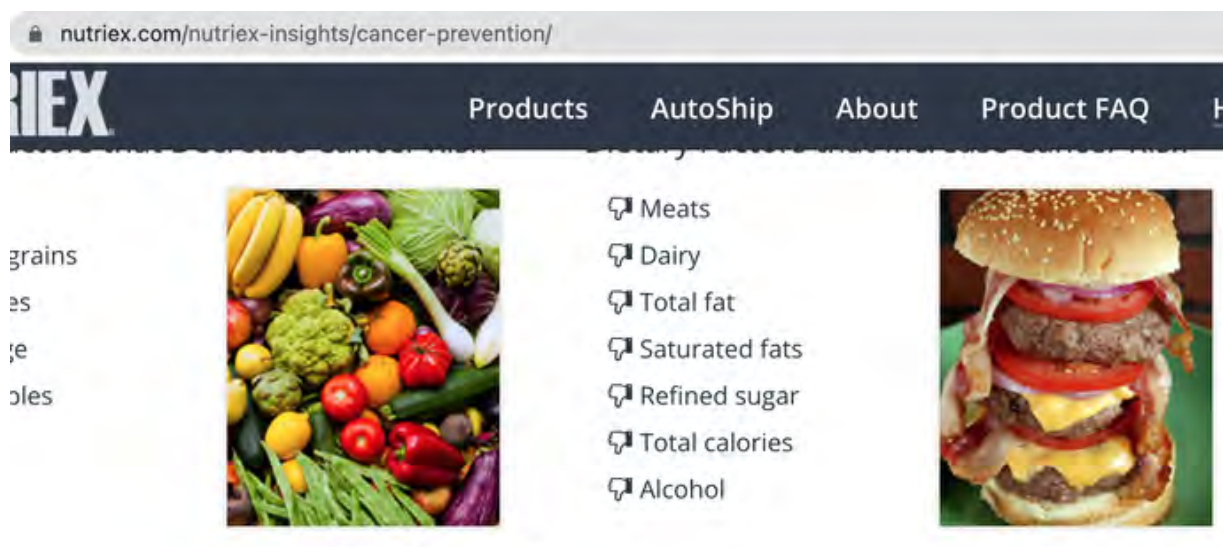


**Image Name**

BeefCheeseburgerTriple001

**Registration Number**

VA0002012581









PreparedFoodPhotos.com  
P.O. Box 1000 • Slatersville, RI. 02876  
licensing@PreparedFoodPhotos.com  
1-866-609-1548

Re: Claim Number: 5456329446615041065  
FRE 408 SETTLEMENT COMMUNICATION

Wednesday, November 30, 2022

**Company Name**

8coupons inc.

**Company Address**

PO Box 70614,  
Salt Lake City, Utah, 84101

**Company Phone Number**

(212) 656-1589

**URL Containing Image**

<https://www.8coupons.com/stores/local/we-deliver-cookeville-38501>



**Image Name**

WrapTurkey004.

**Registration Number**

VA0002017741





PreparedFoodPhotos.com  
P.O. Box 1000 • Slatersville, RI. 02876  
licensing@PreparedFoodPhotos.com  
1-866-609-1548

Re: Claim Number: 5639655623212604722  
FRE 408 SETTLEMENT COMMUNICATION

Friday, June 30, 2023

**Company Name**

Easy Chef's One Million Recipes

**Company Address**


ACR International, LLC  
223 West 1230 North#102  
Provo, Utah 84604

**Company Phone Number**

855-648-1230

**URL Containing Image**

<https://onemillionrecipes.com/free-recipes.html>

 Screen Shot 2023-06-30 at 4.13.15 PM.png



**Image Name**

BeefRibRoast004.jpg

**Registration Number**

VA0002009665



## COPYRIGHT INFRINGEMENT NOTICE

STC

### Alliance Health Networks

#### Mailing Address:

Alliance Health Networks  
9 E Exchange Place Ste. 200  
Salt Lake City, UT 84111

#### Phone #:

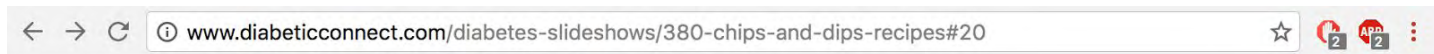
801-355-6002



Meats/Beef/BeefDinner/CornedBeefDinner001\_AD  
L

#### URL Containing Copyrighted Images:

<http://www.diabeticconnect.com/diabetes-slideshows/380-chips-and-dips-recipes#20>



are healthy, diabetic-friendly recipes to help you eat these  
appetizers in good conscience.



#### St. Patrick's Day Recipes

St. Patrick's Day is full of festivities, green and celebrating the luck of the Irish with some delicious food. Here are tasty, diabetic-friendly Irish recipes for your enjoyment.



## COPYRIGHT INFRINGEMENT NOTICE

### Associated Food Stores, Inc

#### Mailing Address:

Associated Food Stores, Inc  
 1850 W 2100 S  
 Salt Lake City Utah 84119

#### Phone #:

801 973 4400



#### URL Containing Copyrighted Image:

<http://cashcarryfoods.com/promotions/115?banner=true>

The screenshot shows a web browser window with the URL [cashcarryfoods.com/promotions/115?banner=true](http://cashcarryfoods.com/promotions/115?banner=true). The website is for Cash & Carry Market, described as "YOUR HOMETOWN GROCER". The navigation bar includes links for Weekly Ad, In Store, Recipes, Produce Glossary, Deli Specials, and Contact Us. The main content area features a recipe for "Corned Beef and Cabbage" with a small image of the dish. The recipe includes a list of ingredients under "What you need:" and a list of instructions under "What you do:". On the right side, there are several red buttons: "Deli Specials", "Store Information", "Our Services", "Need Something Special?", and "Get Email Reminders". The "Need Something Special?" section contains text about product availability and a special order service. The "Get Email Reminders" section encourages joining an e-mail list for advance notice of daily homemade soup specials.

**Cash & Carry MARKET**  
 YOUR HOMETOWN GROCER

Weekly Ad In Store Recipes Produce Glossary Deli Specials Contact Us

### Corned Beef and Cabbage

Make a festive dinner this St. Patrick's Day with Corned Beef and Cabbage.

**What you need:**

- 4-5 pound corned beef brisket
- 1 small onion, quartered
- 5 crushed garlic cloves
- 3 cups water
- 8 oz ginger ale
- 2 Tablespoons sugar
- 2 Tablespoons vinegar
- Corned beef seasoning packet
- 1 pound carrots
- 1 pound red potatoes
- 1 head of cabbage

**What you do:**

1. Place onions and garlic in the bottom of a medium to large slow cooker. Place beef on top of garlic and onions (beef should not touch the bottom of the slow cooker).
2. Combine water, sugar, vinegar, and ginger ale. Pour on brisket. Take seasoning packet and pour on beef.
3. Cook on low for 4 hours, and then add chopped potatoes and carrots. Cook for another 4 hours (8 hours total.) On the 7th hour, add cabbage.

**Deli Specials**

**Store Information**

**Our Services**

**Need Something Special?**

With hundreds of thousands of products available today, we are not able to stock everything in our store. However, if you need something that we do not carry, please let us know. If possible, we can bring the item in, OR you can always have us special order a case for you at our cost, plus 10%.

**Get Email Reminders**

Join our e-mail list for advance notice about our daily homemade soup specials by e-mailing us or calling Carla at 983-0190



Copycat Legal PLLC  
3111 N. University Drive  
Suite 301  
Coral Springs, FL 33065

T 877-HERO-CAT (877-437-6228)  
E [help@copycatlegal.com](mailto:help@copycatlegal.com)

## FRE 408 SETTLEMENT COMMUNICATION

September 8, 2021

### VIA FEDERAL EXPRESS

DD Buffalo, LLC d/b/a Buffalo Run Ranch  
Attn: Joseph T. Sorenson  
6440 S. Wasatch Boulevard  
Suite 105  
Salt Lake City, UT 84121

Buffalo Run Ranch  
4611 East Bench Creek Road  
Woodland, UT 84036

***RE: Prepared Food Photos, Inc. v. DD Buffalo, LLC d/b/a Buffalo Run Ranch***

Dear Mr. Sorenson:

This law firm represents Prepared Food Photos, Inc. I am writing to you because it appears that one or more of our client's copyrighted works was utilized for commercial purposes by Buffalo Run Ranch without first obtaining or purchasing a license from our client. Such unauthorized use constitutes federal copyright infringement under 17 U.S.C. § 501 in addition to other claims potentially arising under federal and/or state law. This letter is sent pursuant to Federal Rule of Civil Procedure 408 and is for settlement purposes only. This letter is an attempt to amicably resolve the dispute specified herein prior to initiation of litigation in which damages, costs, and attorneys' fees will be sought. To the extent we cannot resolve this matter privately, please see the enclosed draft Complaint that we intend to file in the United States District Court for the Southern District of Florida.

Our client is in the business of licensing high-end, professional photographs for the food industry. Through its website ([www.preparedfoodphotos.com](http://www.preparedfoodphotos.com)), our client offers a monthly subscription service which provides access to/license of tens of thousands of professional images. The rights associated with these images are exclusively owned by our client, and it has spent countless hours and substantial monies in building a business that relies on such exclusive subscription service. The unauthorized use of our client's work deprives our client of much-needed income and forces our client to incur substantial costs (monetary and time) in identifying violators and enforcing its rights.



Buffalo Run Ranch  
 September 8, 2021  
 Page 2

To our knowledge, our client **did not** authorize you to use and/or display **any** of its photographs. Notwithstanding this lack of authorization, we have identified one or more of our client's photographs utilized/displayed by Buffalo Run Ranch for commercial purposes (at <https://buffalorunranch.com/>) (in connection with the prior sale of "cube steak"). Screenshots of the photograph(s), together with our client's federally registered copyright information, are attached to and described more fully in the attached draft Complaint.

I encourage you to discuss the foregoing with your attorney and/or your insurance carrier as copyright infringement is a serious matter that potentially exposes you to substantial damages/attorneys' fees if we are forced to file the enclosed lawsuit. Keep in mind that means the attorneys' fees you will be forced to incur to mount a defense (if any) **and** the attorneys' fees/costs we will incur to pursue the matter – **both** of which you will be responsible to pay if our client prevails in court. It is important that you are cognizant of that exposure in deciding how to respond to this letter. Assuming our client prevails in court, 17 U.S.C. § 504(c)(1) provides our client the right to recover statutory damages (for **each work** that was infringed) "in a sum of not less than \$750 or more than \$30,000 as the court considers just." Further, if the infringement was committed "willfully," the court may increase the award of statutory damages (for **each work** that was infringed) "to a sum of not more than \$150,000."

Courts in the Eleventh Circuit (which covers Florida, Georgia, and Alabama) have not hesitated (where appropriate) to impose substantial statutory damages against copyright infringers. See, e.g. Reiffer v. World Views LLC, No. 6:20-cv-786-RBD-GJK, 2021 U.S. Dist. LEXIS 38860, at \*11 (M.D. Fla. Mar. 1, 2021) (awarding \$45,000.00 where **single** photograph of Dubai's cityscape was infringed); Corson v. Gregory Charles Interiors, LLC, No. 9:19-cv-81445, 2020 U.S. Dist. LEXIS 142932, at \*14 (S.D. Fla. Aug. 7, 2020) (awarding \$57,600.00 where **single** photograph was infringed); CCA & B, LLC v. Toy, No. 1:19-CV-01851-JPB, 2020 U.S. Dist. LEXIS 248303, at \*17 (N.D. Ga. Dec. 14, 2020) (awarding \$30,000 for sale of counterfeit goods that infringed plaintiff's copyright). Please keep in mind both that the facts of these cases may be different than those here (thus militating in favor of a higher or lower award here) and that the above amounts do not account for attorneys' fees which are also recoverable under the Copyright Act.

Please note that Section 504 of the Copyright Act provides for the recovery of statutory damages (as explained above) or (at our client's election) actual damages plus "any additional profits of the infringer that are attributable to the infringement and are not taken into account in computing the actual damages." Of course, if forced to litigate this matter, we will fully explore the damages issue and make an election that is most beneficial to our client.

While this is a serious matter, it is not particularly complex. The utilization of our client's work(s) without proper authorization constitutes copyright infringement, and we will either resolve this issue in court (allowing a court to decide the matter) or privately between the parties. To that end, my client's demand is simple – you shall pay **Thirty Thousand Dollars (\$30,000.00 within fourteen (14) days of the date first written above and shall immediately cease and desist from any further use of our client's work(s)**. Please contact us within the above-stated period to arrange for payment. If payment is received as described above, we will forego the filing of a lawsuit. Otherwise, please be aware that our client does not shy away from enforcing its rights in court.

Buffalo Run Ranch  
September 8, 2021  
Page 3

Further, pursuant to Fla. Stat. § 627.4137, you are **required** to provide a copy of this letter to your general liability insurance carrier (if one exists), notify them of our client's demand, disclose the identity of such insurer to us, and provide a copy of the subject insurance policy to us. If you believe we are mistaken as to the allegations of copyright infringement made herein, then we encourage you to provide us with copies of any license or other evidence supporting your authorized use of the subject work(s).

This letter is not intended as one in a series of threatening letters on this subject. Rather, we demand that you respond affirmatively and immediately. If we do not receive such from you or otherwise hear from you to arrange payment, we will file the enclosed lawsuit and allow the courts to decide the matter.

Finally, while removing the unlicensed photograph(s) from commercial display is required, please understand that **removal alone is insufficient to end this matter**. If you do not contact us to arrange for payment for your existing/past use of the photograph(s), a lawsuit **will** be filed and our client **will** pursue the above-described damages against you.

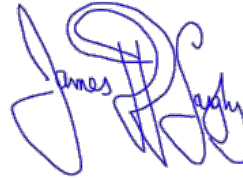
You should give this matter your immediate attention.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Daniel DeSouza".

Daniel DeSouza, Esq.  
Shareholder – For the Firm

Very truly yours,

A handwritten signature in blue ink, appearing to read "James D'Loughy".

James D'Loughy, Esq.  
Shareholder – For the Firm

DD/da  
Encl.

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA

Case No. \_\_\_\_\_

PREPARED FOOD PHOTOS, INC. f/k/a  
ADLIFE MARKETING &  
COMMUNICATIONS CO., INC.,

Plaintiff,

v.

DD Buffalo, LLC d/b/a BUFFALO RUN  
RANCH,

Defendant.

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**COMPLAINT**

Plaintiff Prepared Food Photos, Inc. f/k/a Adlife Marketing & Communications Co., Inc. (“Plaintiff”) sues defendant DD Buffalo, LLC d/b/a Buffalo Run Ranch (“Defendant”), and alleges as follows:

**THE PARTIES**

1. Plaintiff is a corporation organized and existing under the laws of the State of Florida with its principal place of business located in Palm Beach County, Florida.
2. Defendant is a limited liability company organized and existing under the laws of the State of Utah with its principal place of business located at 6440 Wasatch Boulevard, Suite 105, Salt Lake City, UT 84121. Defendant’s agent for service of process is: Corporate Agent Services, LLC, 26 S State Street, Suite 1900, Salt Lake City, UT 84111.

**JURISDICTION AND VENUE**

3. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338(a).

4. This Court has personal jurisdiction over Defendant pursuant to Fla. Stat. §§ 48.193(1)(a)(2) because it committed a tortious act within this state, and the exercise of personal jurisdiction over it would not offend traditional notions of fair play and substantial justice. “Copyright infringement is a tortious act, and the Florida long-arm statute confers jurisdiction if the effects of the infringement were felt in the state. Here, it is undisputed that Plaintiff is a resident of Florida, and as such the effects of any alleged copyright infringement would be felt in Florida.” Vallejo v. Narcos Prods., LLC, No. 1:18-cv-23462-KMM, 2019 U.S. Dist. LEXIS 198109, at \*5 (S.D. Fla. June 14, 2019) (citing Roberts v. Gordy, No. 13-24700-CIV, 2015 U.S. Dist. LEXIS 180644, 2015 WL 11202580, at \*2 (S.D. Fla. Apr. 14, 2015)). Roof & Rack Prods., Inc. v. GYB Inv'rs, LLC, No. 13-80575-CV, 2014 U.S. Dist. LEXIS 92334, at \*2 (S.D. Fla. July 8, 2014) (“Copyright infringement is a tortious act, and a person who infringes upon a copyright whose owner resides in Florida causes injury inside the state.”); Venus Fashion, Inc. v. Changchun Chengji Tech. Co., No. 16-61752-CIV-DIMITROULEAS/S, 2016 U.S. Dist. LEXIS 194263, at \*6-7 (S.D. Fla. Nov. 2, 2016) (“In cases involving online intellectual property infringement, the posting of an infringing item on a website may cause injury and occur in Florida by virtue of the website's accessibility in Florida, regardless of where the offensive material was posted.”) (collecting cases).

5. Venue properly lies in this district pursuant to 28 U.S.C. § 1400(a) because Defendant or its agents reside or may be found in this district. “A defendant ‘may be found’ in a district in which he could be served with process; that is, in a district which may assert personal jurisdiction over the defendant.” Palmer v. Braun, 376 F.3d 1254, 1259-60 (11th Cir. 2004). “In other words, ‘if a court has personal jurisdiction over the defendants in a copyright infringement action, venue in that court’s district is proper.’” McGregor v. In Tune Music Grp., No. 15-62044-

CIV-ZLOCH, 2016 U.S. Dist. LEXIS 190302, at \*11 (S.D. Fla. July 29, 2016) (quoting Store Decor Div. of Jas Int'l, Inc. v. Stylex Worldwide Indus., Ltd., 767 F. Supp. 181, 185 (N.D. Ill. 1991)).

## **FACTS**

### **I. Plaintiff's Business**

6. Plaintiff is in the business of licensing high-end, professional photographs for the food industry.

7. Through its commercial website ([www.preparedfoodphotos.com](http://www.preparedfoodphotos.com)), Plaintiff offers a monthly subscription service which provides access to/license of tens of thousands of professional images.

8. As of the date of this pleading, Plaintiff charges its clients (generally, grocery stores, restaurant chains, food service companies, etc.) a monthly fee of \$999.00 for access to its library of professional photographs.

9. Plaintiff does not license individual photographs or otherwise make individual photographs available for purchase. Plaintiff's business model relies on its recurring monthly subscription service such that Plaintiff can continue to maintain its impressive portfolio.

10. Plaintiff owns each of the photographs available for license on its website and serves as the licensing agent with respect to licensing such photographs for limited use by Plaintiff's customers. To that end, Plaintiff's standard terms include a limited, non-transferable license for use of any photograph by the customer only. Plaintiff's license terms make clear that all copyright ownership remains with Plaintiff and that its customers are not permitted to transfer, assign, or sub-license any of Plaintiff's photographs to another person/entity.



## II. The Work at Issue in this Lawsuit

11. In 1999, a professional photographer created a photograph titled “BeefCubeSteakGrI Mrk001.jpg” (the “Work”). A copy of the Work is exhibited below.



12. The Work was registered by Plaintiff (pursuant to a work-for-hire agreement with the author that transferred all rights and title in the photograph to Plaintiff) with the Register of Copyrights on August 5, 2016 and was assigned Registration No. VA 2-012-581. A true and correct copy of the Certification of Registration pertaining to the Work is attached hereto as **Exhibit “A.”**

13. Plaintiff is the owner of the Work and has remained the owner at all times material hereto.

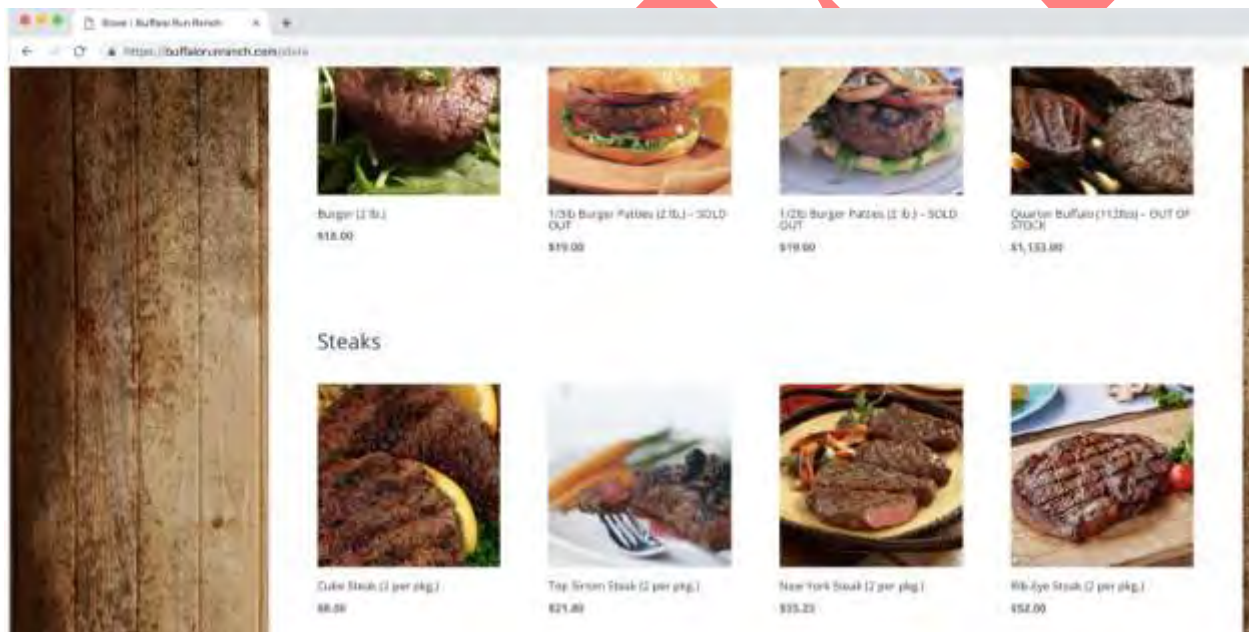
## III. Defendant’s Unlawful Activities

14. Defendant owns and operates a buffalo ranch in Woodland, Utah and operates an online store (at <https://buffalorunranch.com/>) that sells buffalo meat/other products to customers

throughout the United States.

15. Defendant advertises/markets its business primarily through its aforementioned website, social media (e.g. [https://www.facebook.com/buffalorunranchwoodland/about/?ref=page\\_internal](https://www.facebook.com/buffalorunranchwoodland/about/?ref=page_internal)), and other forms of advertising.

16. On a date after Plaintiff's above-referenced copyright registration of the Work, Defendant published the Work on its <https://buffalorunranch.com/> website in connection with the sale of "Cube Steak (2 per pkg.)":



A true and correct copy of screenshots of Defendant's website, displaying the copyrighted Work, is attached hereto as **Exhibit "B."**

17. The foregoing display of the Work on Defendant's website was accessible and was in fact accessed from persons in the State of Florida.

18. Defendant is not and has never been licensed to use or display the Work. Defendant never contacted Plaintiff to seek permission to use the Work in connection with its

website/advertising or for any other purpose – even though the Work that was copied is clearly professional stock photography that would put Defendant on notice that the Work was not intended for public use.

19. Defendant utilized the Work for commercial use – namely, in connection with the marketing of Defendant’s business and sale of buffalo meat product.

20. Upon information and belief, Defendant located a copy of the Work on the internet and, rather than contact Plaintiff to secure a license, simply copied the Work for its own commercial use.

21. Through its ongoing diligent efforts to identify unauthorized use of its photographs, Plaintiff first discovered Defendant’s unauthorized use/display of the Work in approximately May 2019. Following Plaintiff’s discovery, Plaintiff notified Defendant in writing of such unauthorized use. To date, however, Defendant has not responded to Plaintiff, thus necessitating the filing of this lawsuit to protect Plaintiff’s rights with respect to the Work.

22. All conditions precedent to this action have been performed or have been waived.

### **COUNT I – COPYRIGHT INFRINGEMENT**

23. Plaintiff re-alleges and incorporates paragraphs 1 through 22 as set forth above.

24. The Work is an original work of authorship, embodying copyrightable subject matter, that is subject to the full protection of the United States copyright laws (17 U.S.C. § 101 *et seq.*).

25. Plaintiff owns a valid copyright in the Work, having registered the Work with the Register of Copyrights and owning sufficient rights, title, and interest to such copyright to afford Plaintiff standing to bring this lawsuit and assert the claim(s) herein.

26. As a result of Plaintiff’s reproduction, distribution, and public display of the Work,

Defendant had access to the Work prior to its own reproduction, distribution, and public display of the Work on its commercial website.

27. Defendant reproduced, distributed, and publicly displayed the Work without authorization from Plaintiff.

28. By its actions, Defendant infringed and violated Plaintiff's exclusive rights in violation of the Copyright Act, 17 U.S.C. § 501, by reproducing, distributing, and publicly displaying the Work for its own commercial purposes.

29. Defendant's infringement was willful as it acted with actual knowledge or reckless disregard for whether its conduct infringed upon Plaintiff's copyright. Notably, in the "Terms of Service" published on Defendant's website, Defendant includes a section titled "Copyright Infringement and DMCA Policy" which states, in material part: "As Buffalo Run Ranch asks others to respect its intellectual property rights, it respects the intellectual property rights of others." Defendant clearly understands that high-end food photography is not generally available for free or that such can simply be copied from the internet.

30. Plaintiff has been damaged as a direct and proximate result of Defendant's infringement.

31. Plaintiff is entitled to recover its actual damages resulting from Defendant's unauthorized use of the Work and, at Plaintiff's election (pursuant to 17 U.S.C. § 504(b), Plaintiff is entitled to recover damages based on a disgorgement of Defendant's profits from infringement of the Work, which amounts shall be proven at trial.

32. Alternatively, and at Plaintiff's election, Plaintiff is entitled to statutory damages pursuant to 17 U.S.C. § 504(c), in such amount as deemed proper by the Court.

33. Pursuant to 17 U.S.C. § 505, Plaintiff is further entitled to recover its costs and

attorneys' fees as a result of Defendant's conduct.

34. Defendant's conduct has caused and any continued infringing conduct will continue to cause irreparable injury to Plaintiff unless enjoined by the Court. Plaintiff has no adequate remedy at law. Pursuant to 17 U.S.C. § 502, Plaintiff is entitled to a permanent injunction prohibiting infringement of Plaintiff's exclusive rights under copyright law.

**WHEREFORE**, Plaintiff demands judgment against Defendant as follows:

- a. A declaration that Defendant has infringed Plaintiff's copyrights in the Work;
- b. A declaration that such infringement is willful;
- c. An award of actual damages and disgorgement of profits as the Court deems proper or, at Plaintiff's election, an award of statutory damages for willful infringement up to \$150,000.00 for each infringement of the Work;
- d. Awarding Plaintiff its costs and reasonable attorneys' fees pursuant to 17 U.S.C. § 505;
- e. Awarding Plaintiff interest, including prejudgment interest, on the foregoing amounts;
- f. Permanently enjoining Defendant, its employees, agents, officers, directors, attorneys, successors, affiliates, subsidiaries and assigns, and all those in active concert and participation with Defendant, from directly or indirectly infringing Plaintiff's copyrights or continuing to display, transfer, advertise, reproduce, or otherwise market any works derived or copied from the Work or to participate or assist in any such activity; and
- g. For such other relief as the Court deems just and proper.

**Demand For Jury Trial**

Plaintiff demands a trial by jury on all issues so triable.

Dated: \_\_\_\_\_, 2021.



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Suite 301  
Coral Springs, FL 33065  
Telephone: (877) 437-6228  
[dan@copycatlegal.com](mailto:dan@copycatlegal.com)  
[james@copycatlegal.com](mailto:james@copycatlegal.com)

By: /s/ Daniel DeSouza, Esq.  
Daniel DeSouza, Esq.  
Florida Bar No.: 19291  
James D'Loughy, Esq.  
Florida Bar No.: 0052700

DRAFT

# EXHIBIT "A"

## Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

*Maria A. Pallante*

United States Register of Copyrights and Director

Registration Number

**VA 2-012-581**

Effective Date of Registration:

August 05, 2016

## Title

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**Title of Work:** ADLIFE Collection 073116

**Previous or Alternate Title:** Group Registration/ Photos, 135 photos published 1/11 - 12/29/1999

**Series Title:** BeefFiletmignonGrI Mrk013  
**Number:** 001  
**Date on Copies:** 05/10/1999

BeefHamburger022  
**Number:** 002  
**Date on Copies:** 07/20/1999

BeefHamburgerGrill003  
**Number:** 003  
**Date on Copies:** 07/19/1999

BeefHotDog005  
**Number:** 004  
**Date on Copies:** 06/15/1999

BeefLondonBroilGrI Mark004  
**Number:** 005  
**Date on Copies:** 05/08/1999

BeefTboneGrillFire001  
**Number:** 006  
**Date on Copies:** 10/30/1999

CherryBing010  
**Number:** 007  
**Date on Copies:** 06/04/1999

ChickenDrumstickGrI Mark004  
**Number:** 008  
**Date on Copies:** 07/21/1999

ChickenHalfGrill002  
**Number:** 009  
**Date on Copies:** 12/23/1999

ChickenWingBuffalo013  
**Number:** 010  
**Date on Copies:** 11/09/1999

CookiePeanutButterKiss004  
Number: 011  
Date on Copies: 12/10/1999

CookiePizelle001  
Number: 012  
Date on Copies: 07/30/1999

Guacamole005  
Number: 013  
Date on Copies: 09/15/1999

JuiceSmoothy001  
Number: 014  
Date on Copies: 10/10/1999

JuiceTomato001  
Number: 015  
Date on Copies: 10/10/1999

LobsterBoiled001  
Number: 016  
Date on Copies: 09/20/1999

LoxBagel  
Number: 017  
Date on Copies: 03/24/1999

Peach005  
Number: 018  
Date on Copies: 11/04/1999

PeachKnife001  
Number: 019  
Date on Copies: 11/04/1999

PieLemonMeringueSlice002  
Number: 020  
Date on Copies: 08/30/1999

PieStrawberry006  
Number: 021  
Date on Copies: 08/05/1999

PorkRibBabyBack011  
Number: 022  
Date on Copies: 07/29/1999

PorkRibCntyStlBnIn011  
Number: 023  
Date on Copies: 07/22/1999

PorkRibGrill003  
Number: 024  
Date on Copies: 07/25/1999

SaladColeSlaw014  
Number: 025



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Tortilla001

**Number:** 026

**Date on Copies:** 09/10/1999

AppetizerAsst004

**Number:** 027

**Date on Copies:** 04/17/1999

BaconFig001

**Number:** 028

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CeleryPeanutbutter001

**Number:** 029

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CeleryPeanutbutter002

**Number:** 030

**Date on Copies:** 04/17/1999

CrackerPepperoni001

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HummasTabuli001

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BeefCheesburgerGrill001

**Number:** 033

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Hummas006

**Number:** 034

**Date on Copies:** 04/17/1999

BeefCheeseburgerGrI Mrk006

**Number:** 035

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BeefCheeseburgerTriple001

**Number:** 036

**Date on Copies:** 04/17/1999

BeefHamburger005

**Number:** 037

**Date on Copies:** 04/17/1999

Hummus008

**Number:** 038

**Date on Copies:** 04/17/1999

BeefHamburger007

**Number:** 039

**Date on Copies:** 04/17/1999



JalapenoPopper001  
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LobsterDip001  
Number: 041  
Date on Copies: 04/17/1999

BeefHamburgerGrilMrk005  
Number: 042  
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LobsterShrimpDip001  
Number: 043  
Date on Copies: 04/17/1999

BeefHamburgerGrilMark008  
Number: 044  
Date on Copies: 04/17/1999

BeefMeatball001  
Number: 045  
Date on Copies: 04/17/1999

BeefMeatball004  
Number: 046  
Date on Copies: 04/17/1999

MediterraneanTray001  
Number: 047  
Date on Copies: 04/17/1999

MediterraneanTray002  
Number: 048  
Date on Copies: 08/15/1999

BeefMeatloaf014  
Number: 049  
Date on Copies: 08/15/1999

OnionRing001  
Number: 050  
Date on Copies: 03/27/1999

OnionRing003  
Number: 051  
Date on Copies: 04/17/1999

PartyTray001  
Number: 052  
Date on Copies: 09/20/1999

Bacon005  
Number: 053  
Date on Copies: 09/20/1999

PorkButtSteakGrilMrk001  
Number: 054



**Date on Copies:** 09/20/1999

BeefMeatLoaf016

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**Date on Copies:** 09/20/1999

BeefMeatloaf018

**Number:** 056

**Date on Copies:** 09/20/1999

BeefSloppyJoe001

**Number:** 057

**Date on Copies:** 09/20/1999

BeefStuffedPepper001

**Number:** 058

**Date on Copies:** 09/20/1999

BakedAlaska001

**Number:** 059

**Date on Copies:** 09/20/1999

PorkChopBaconWrapped001

**Number:** 060

**Date on Copies:** 09/20/1999

PorkChopBnIn009

**Number:** 061

**Date on Copies:** 09/20/1999

BeefLondonBroil013

**Number:** 062

**Date on Copies:** 04/01/1999

TilapiaWholeCooked001

**Number:** 063

**Date on Copies:** 05/21/1999

WhiteAmericanCheeseHC1103\_L\_300\_C\_R

**Number:** 064

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Number: 070

Date on Copies: 10/20/1999

CucumbersFSHC1412\_L\_300\_C\_R

Number: 071

Date on Copies: 08/07/1999

FlowerBouquetFSCH1305\_L\_300\_C\_R

Number: 072

Date on Copies: 06/11/1999

MiniLoavesHC1111FS\_L\_300\_C\_R

Number: 073

Date on Copies: 08/10/1999

SalsaDipChipsHC1108\_L\_300\_C\_R

Number: 074

Date on Copies: 04/15/1999

BrowniesHC1012\_M\_150\_C\_R

Number: 075

Date on Copies: 08/18/1999

BratwurstGrilledFSHC1112\_L\_300\_C\_R

Number: 076

Date on Copies: 08/19/1999

BeefChuckRoast7Bone001

Number: 077

Date on Copies: 04/20/1999

BeefChuckRoastBnIn005

Number: 078

Date on Copies: 03/03/1999

BeefChuckRoastBnls006

Number: 079

Date on Copies: 02/13/1999

BeefChuckSteakBnls007

Number: 080

Date on Copies: 08/10/1999

BeefEyeRoundRoastDinner001

Number: 081

Date on Copies: 11/13/1999

CornedBeefDinner001

Number: 082

Date on Copies: 01/30/1999

CornedBeefDinner009

Number: 083



**Date on Copies:** 02/23/1999

CornedBeefDinner010

**Number:** 084

**Date on Copies:** 04/09/1999

CornedBeefDinner013

**Number:** 085

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CornedBeefDinner014

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CornedBeefDinner021

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DSCO3680

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CornedBeefDinner023

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PotRoastDinner001

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SalisburySteakDinner002

**Number:** 091

**Date on Copies:** 08/09/1999

BeefHotDog011

**Number:** 092

**Date on Copies:** 02/10/1999

BeefBottomRoundRoast015

**Number:** 093

**Date on Copies:** 12/12/1999

BeefBottomRoundRoast017

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**Date on Copies:** 04/30/1999

BeefBrisket001

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BeefBrisket007

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Bacon002  
Number: 100  
Date on Copies: 11/03/1999

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Number: 101  
Date on Copies: 02/04/1999

BeefKabob001  
Number: 102  
Date on Copies: 11/28/1999

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Number: 103  
Date on Copies: 12/29/1999

BeefKabobGrI Mrk002  
Number: 104  
Date on Copies: 01/11/1999

BeefCubeSteakGrI Mrk001  
Number: 105  
Date on Copies: 09/17/1999

BeefEyeRoundRoast002  
Number: 106  
Date on Copies: 09/17/1999

BeefEyeRoundRoast014  
Number: 107  
Date on Copies: 11/26/1999

BeefEyeRoundSteakGrI Mrk001  
Number: 108  
Date on Copies: 09/17/1999

BeefFiletMignon001  
Number: 109  
Date on Copies: 10/28/1999

BeefFiletMignon002  
Number: 110  
Date on Copies: 12/15/1999

BeefFlatIronSteakGrI Mrk001  
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Date on Copies: 09/06/1999

BeefFiletMignonGrI Mrk001  
Number: 111





**Date on Copies:** 06/15/1999

BeefFiletMignonGrI Mrk007

**Number:** 112

**Date on Copies:** 09/07/1999

BeefFiletMignonGrI Mrk008

**Number:** 113

**Date on Copies:** 01/13/1999

BeefFiletMignonGrI Mrk010

**Number:** 114

**Date on Copies:** 04/23/1999

BeefFlankSteak005

**Number:** 115

**Date on Copies:** 08/16/1999

BeefCheeseBurger001

**Number:** 117

**Date on Copies:** 08/16/1999

BeefCheeseBurger003

**Number:** 118

**Date on Copies:** 08/16/1999

RiceNoodleDumpling001

**Number:** 119

**Date on Copies:** 10/15/1999

CakeChocolateMapleSlice001

**Number:** 120

**Date on Copies:** 07/15/1999

Pancake002

**Number:** 121

**Date on Copies:** 03/04/1999

FriedRice002

**Number:** 122

**Date on Copies:** 01/24/1999

IceCreamNeapolitanCone001

**Number:** 123

**Date on Copies:** 08/13/1999

SpiralHam

**Number:** 124

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TurkeyWhole014

**Number:** 125

**Date on Copies:** 11/29/1999

KeyLimes

**Number:** 126

**Date on Copies:** 10/23/1999

ChickenKabob002  
Number: 127  
Date on Copies: 12/29/1999

LambLegBnls001  
Number: 128  
Date on Copies: 02/03/1999

LambLegShankGrIMrk001  
Number: 129  
Date on Copies: 05/20/1999

ZittiMarinaraSauce001  
Number: 130  
Date on Copies: 12/22/1999

TurkeyWhole001  
Number: 131  
Date on Copies: 12/04/1999

YogurtBlueberry002  
Number: 132  
Date on Copies: 07/21/1999

SubAmericanColdCut009  
Number: 133  
Date on Copies: 07/30/1999

MediterraneanChicken  
Number: 134  
Date on Copies: 05/27/1999

Vegetables  
Number: 135  
Date on Copies: 01/27/1999

## Completion/Publication

Year of Completion: 1999  
Date of 1st Publication: January 11, 1999  
Nation of 1<sup>st</sup> Publication: United States

## Author

- Author: Adlife Marketing & Communications Co., Inc., Employer for Hire of David Cioffi  
Author Created: photograph  
Work made for hire: Yes  
Domiciled in: United States

## Copyright Claimant

Copyright Claimant: Adlife Marketing & Communications Co., Inc.  
38 CHURCH ST., PAWTUCKET, RI, 02860-3906, United States



## **Rights and Permissions**

---

**Organization Name:** SHORES & OLIVER P.C.  
**Name:** Milton McKinnon Oliver  
**Email:** milton.oliver@shoresoliver.com  
**Telephone:** (774)521-3058  
**Alt. Telephone:** (781)910-9664  
**Address:** PO BOX 790  
COTUIT, MA 02635-0790 United States

## **Certification**

---

**Name:** MILTON M. OLIVER  
**Date:** August 05, 2016  
**Applicant's Tracking Number:** 873-057-302

---

**Correspondence:** Yes



# EXHIBIT “B”





Adlife Marketing & Communications Co., Inc.  
38 Church St • Pawtucket, RI 02860  
Phone: (401) 723-4782

Re: Claim Number: 4326406162212721900  
FRE 408 SETTLEMENT COMMUNICATION

Thursday, May 2, 2019

### Company Name

Buffalo Run Ranch

### Company Address

4611 E Bench Creek Rd  
Woodland, UT 84036

### Company Phone Number

435-200-9360

### URL Containing Image

<https://buffalorunranch.com/>

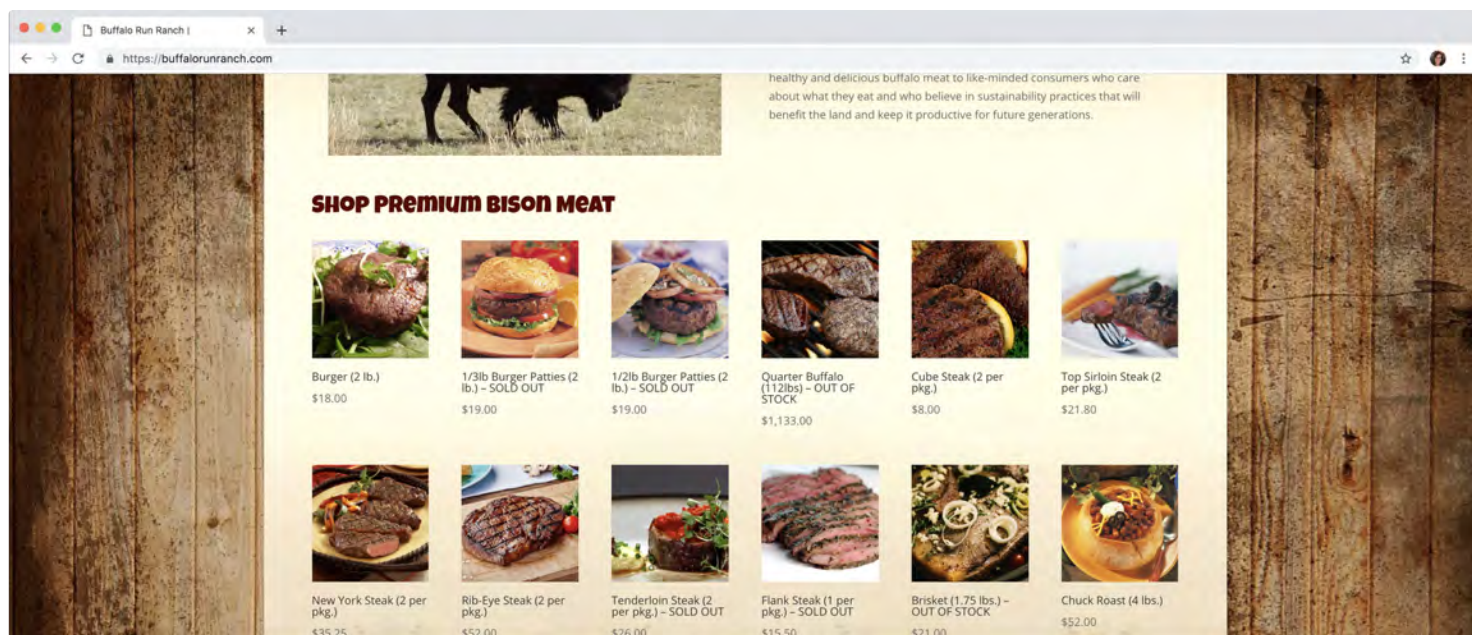


### Image Name

BeefCubeSteakGrIMrk001

### Registration Number

VA0002012581





Adlife Marketing & Communications Co., Inc.  
38 Church St • Pawtucket, RI 02860  
Phone: (401) 723-4782

Re: Claim Number: 4326407502212033489  
FRE 408 SETTLEMENT COMMUNICATION

Thursday, May 2, 2019

### Company Name

Buffalo Run Ranch

### Company Address

4611 E Bench Creek Rd  
Woodland, UT 84036

### Company Phone Number

435-200-9360

### URL Containing Image

<https://buffalorunranch.com/product-category/steaks>

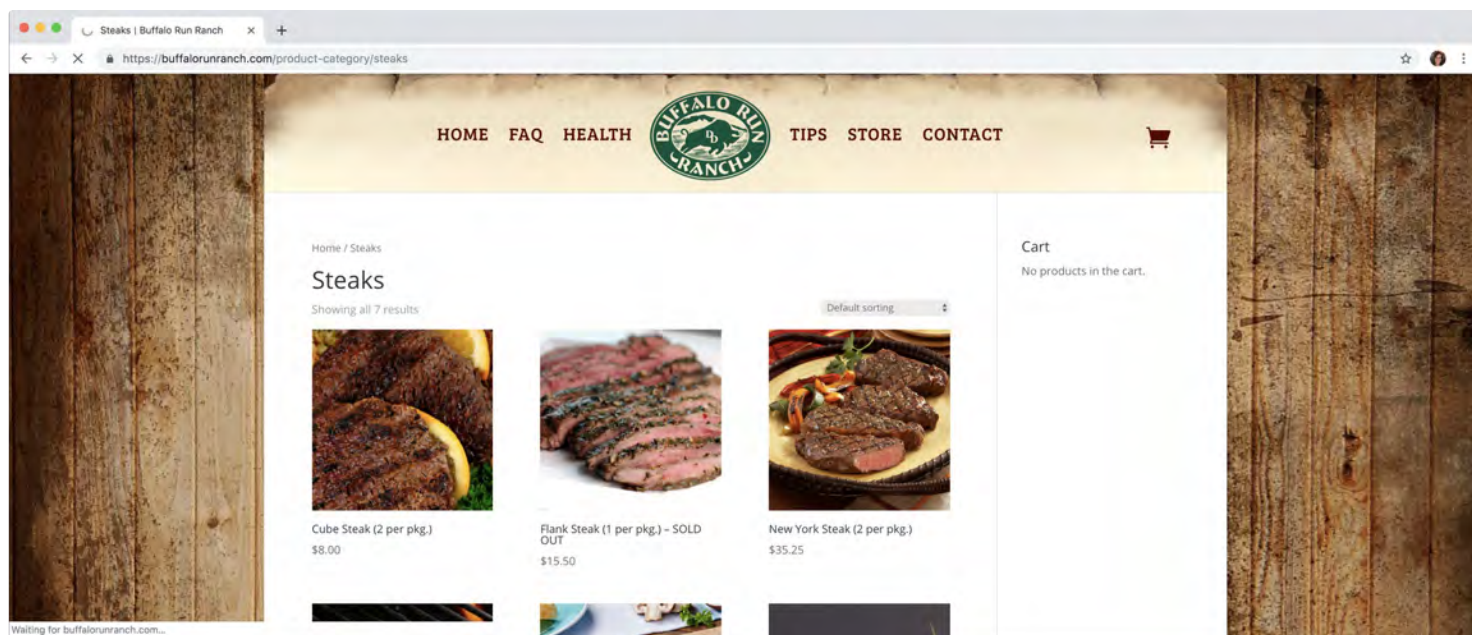


### Image Name

BeefCubeSteakGrI Mrk001

### Registration Number

VA0002012581







Adlife Marketing & Communications Co., Inc.  
38 Church St • Pawtucket, RI 02860  
Phone: (401) 723-4782

Re: Claim Number: 4326408342215496142  
FRE 408 SETTLEMENT COMMUNICATION

Thursday, May 2, 2019

### Company Name

Buffalo Run Ranch

### Company Address

4611 E Bench Creek Rd  
Woodland, UT 84036

### Company Phone Number

435-200-9360

### URL Containing Image

<https://buffalorunranch.com/store>

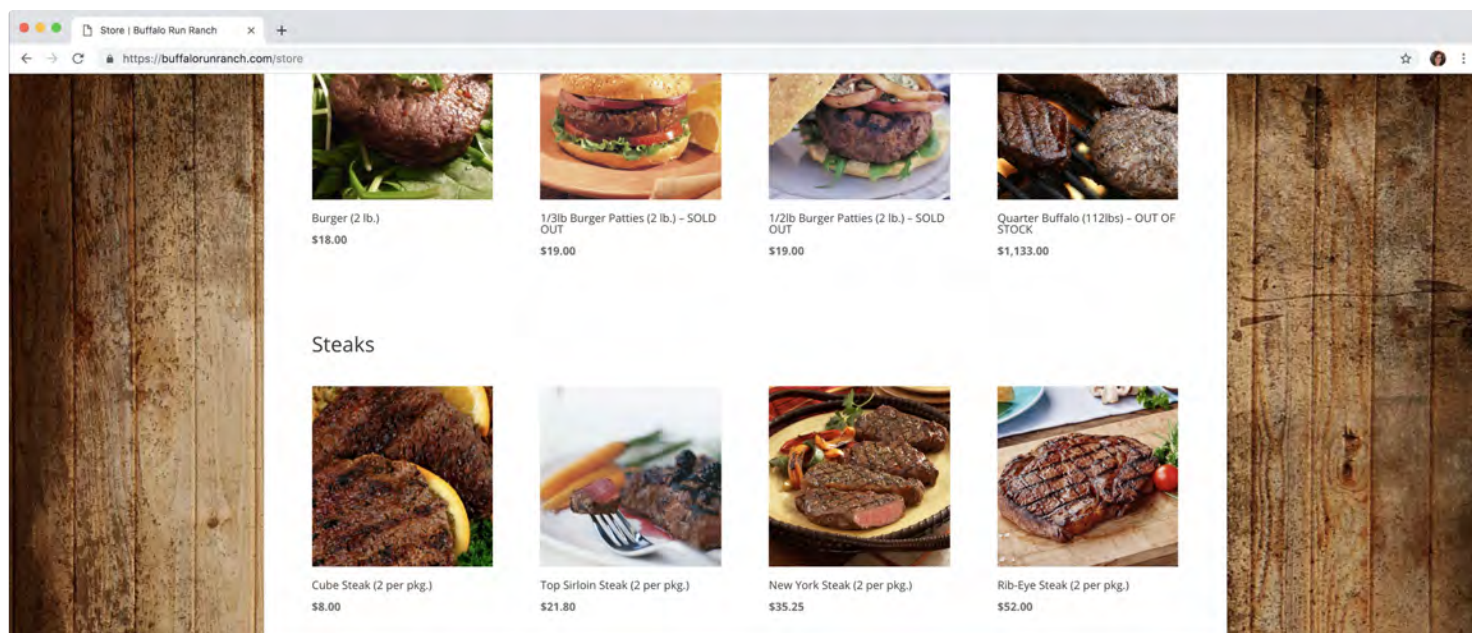


### Image Name

BeefCubeSteakGrI Mrk001

### Registration Number

VA0002012581





## **IMPORTANT!**

Adlife has conducted a routine audit of its licensed images. Having completed this audit, we have found significantly more usage than properly licensed.

Adlife does not have a record of your license on file and believes a license and/or copyright infringement may have been committed.

Should you or your company have proper licensing in place, please contact us directly. Should there be an appropriate license and you are able to substantiate it, please provide same to us.

If you do have a license we apologize for any inconvenience this may have caused.

**Adlife Marketing  
& Communications Co., Inc.**

38 Church Street  
Pawtucket, RI 02860

Dear Sir,

Adlife Marketing and Communications Co., Inc. (Adlife) is the owner of the copyrights and images of certain photographs which have been used by you or your agents or representatives without Adlife's permission or authorization.

**At the present time, and for settlement purposes only, Adlife values the cost of this infringement at \$8,000.00.**

**If you have a casualty insurance policy, please forward these documents to your insurance carrier, as these claims are often covered.**

Attached please find the image(s) that were used and the verification of the use of the image(s).

Pursuant to 17 USC chapter 1, section 101 the use of photographs and other pictorial images are protected from unlawful use or reproduction without the consent of the owner of those images.

Pursuant to 17 USC, section 504(b) and (c) a copyright owner may recover the actual damages incurred by it for wrongful and unpermitted use of its images. If the infringement was committed willfully, the courts have discretion to award up to \$150,000 per willful infringement.

Based on the fact that you knew or should have known that the images belonged to Adlife, and based on the fact they you used the images on multiple occasions without permission and due to the fact that the images were disseminated to a vast number of people for the purpose of profiting your business, Adlife can only conclude that the use of its images was willful and intentional.

Adlife is writing to you to resolve its claim for money damages without the necessity of the time and expense of a law suit.

If, however, Adlife cannot immediately resolve the issue of the unlawful use of its images, it will be forced to file suit in the appropriate court and jurisdiction and seek the maximum damages permitted under the statute including costs and attorney fees.

Adlife would like to discuss this account with you knowing however that the sole purpose of any conversation with Adlife will be limited to why this is not a willful infraction and/or how the individual or company intends to pay this amount.

I urge you to contact me directly at joel@adlife.com. If Adlife does not hear from you within 10 days it will assume that you do not intend to resolve this matter amicably and it will take all necessary action without further notification.

Joel M. Albrizio  
President  
Adlife Marketing & Communications  
joel@adlife.com  
Direct line (617) 759-4504

Adlife Marketing & Communications Co., Inc.



Adlife Marketing & Communications Co., Inc.  
38 Church St • Pawtucket, RI 02860  
Phone: (401) 723-4782

Re: Claim Number: 4458764402212268911  
FRE 408 SETTLEMENT COMMUNICATION

Wednesday, October 2, 2019

**Company Name**

Caley's Catering & Events

**Company Address**

PO Box 104  
Draper, Utah 84020

**Company Phone Number**

801-231-5250

**URL Containing Image**

<https://caleyscatering.com/lite-menu-options/>

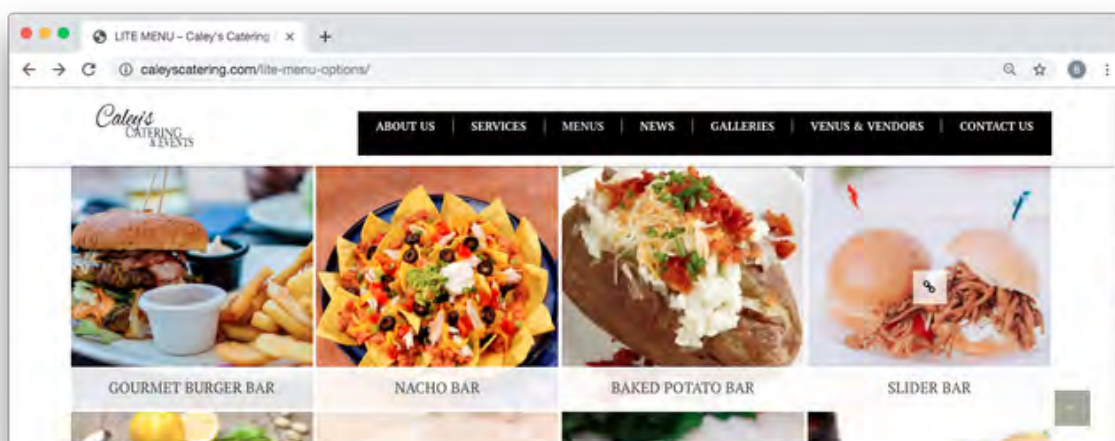


**Image Name**

PotatoBaked013

**Registration Number**

VA0002019412





## COPYRIGHT INFRINGEMENT NOTICE

### Clearing Space by Design - Linda Isom

#### Mailing Address:

Linda Isom  
 414 S 1125 W  
 Layton, Utah 84041

#### Phone #:

801 593 9566

#### URL Containing Copyrighted Image:

[http://www.clearingspacebydesign.com/2009\\_11\\_01\\_archive.html](http://www.clearingspacebydesign.com/2009_11_01_archive.html)



Image: Ethnic/TexMex/Taquito003

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Welcome! I'm Linda Isom, professional organizer, small business owner, wife, mother and lover of all aspects of organization. Just like everyone else, I am a work in progress. Here you will find helpful organizing tips, informative discussions, creative solutions to everyday organizing problems and much more. Thanks for stopping by and come back often to see what's new!

SEARCH THIS BLOG

WEDNESDAY, NOVEMBER 25, 2009

#### How to plan a successful, stress free holiday party

Here we are again at the time of year the decorations, the presents, the hype, the STRESS! Like many of you, I am hosting a few holiday parties. Here are a few tips on making your preparations stress free:

Send Invitations( Ideally 2 weeks to 10 days before the party):

2. Make things simpler by having your guests RSVP only if they are not attending.

Make Lists(write these down all in the same place. And again, the earlier the better):

LIKE US ON FACEBOOK! YOUR LIFE ORGANIZED WITH CLEARING SPACE BY DESIGN.

Like Share 334 people like this. Be the first of your friends.



Adlife Marketing & Communications Co., Inc.  
38 Church St • Pawtucket, RI 02860  
Phone: (401) 723-4782

**Re: Claim Number: 4326406162212721900**  
**FRE 408 SETTLEMENT COMMUNICATION**

Thursday, May 2, 2019

**Buffalo Run Ranch**

4611 E Bench Creek Rd  
Woodland, UT 84036

Dear Buffalo Run Ranch,

You are receiving this correspondence because you may have used the attached image unlawfully.

The image in question is owned by Adlife Marketing & Communications Co., Inc. and was discovered on your website. This image is part of our library of images protected under copyright. Attached is a copy of the image, pertinent information regarding Adlife's proof of ownership, along with the usage of this image on your company's website. If you have a license, please contact us immediately with a copy of that license at [licensing@adlife.com](mailto:licensing@adlife.com).

The use of a copyrighted image without the valid licensing in place is copyright infringement and is in violation of U.S. Copyright law, Title 17 of the United States Code. The purpose of this correspondence is to confirm a previously purchased license for the use of the image OR reach a fair settlement.

**If a valid license was purchased for the use of the image:** Please provide Adlife a copy of the purchase receipt. In most cases, you can access your download history from the stock image website which was used. A screenshot indicating when the image was purchased, and from whom, will suffice. Any and all valid license information can be forwarded to [licensing@adlife.com](mailto:licensing@adlife.com).

**If you know a valid license for this image does NOT exist:** You must immediately cease and desist the use of this image and remove it from any promotional and/or advertising usage in any and all media. Attached is information whereby you have the ability to purchase retroactive licensing rights for the image in question, for the amount of **\$8,000.00**, which will abate and eliminate any liability associated with the past unlawful use of said image. To avoid further action, such as possible litigation in Federal Court, it is recommended that you contact us at your earliest convenience.

It is important that you understand that just removing the image from your company's website does not release you from any potential liability associated with the unlawful use of the image. The Adlife Licensing Department is willing to discuss the matter and the circumstances surrounding the use of the image. However, Adlife expects to be compensated for the use of the image in question if not properly licensed. If, after settling the issue of the unlawful use of this image in the past, you are interested in continuing to use the image, the Adlife Licensing Department will assist you in obtaining the proper license for all **future** use.

Please note that your failure to respond to this notice may result in further legal action. If you believe this letter has reached you in error, please contact Adlife Licensing Department at [licensing@adlife.com](mailto:licensing@adlife.com). This letter is without prejudice to Adlife's rights and remedies, all of which are expressly reserved.

We look forward to your prompt response to this matter.

Sincerely,

Rebecca M. Jones  
Adlife Licensing Department  
401-543-7553

PreparedFoods\_000056





Adlife Marketing & Communications Co., Inc.  
38 Church St • Pawtucket, RI 02860  
Phone: (401) 723-4782

Re: Claim Number: 4326406162212721900  
FRE 408 SETTLEMENT COMMUNICATION

Thursday, May 2, 2019

### Company Name

Buffalo Run Ranch

### Company Address

4611 E Bench Creek Rd  
Woodland, UT 84036

### Company Phone Number

435-200-9360

### URL Containing Image

<https://buffalorunranch.com/>

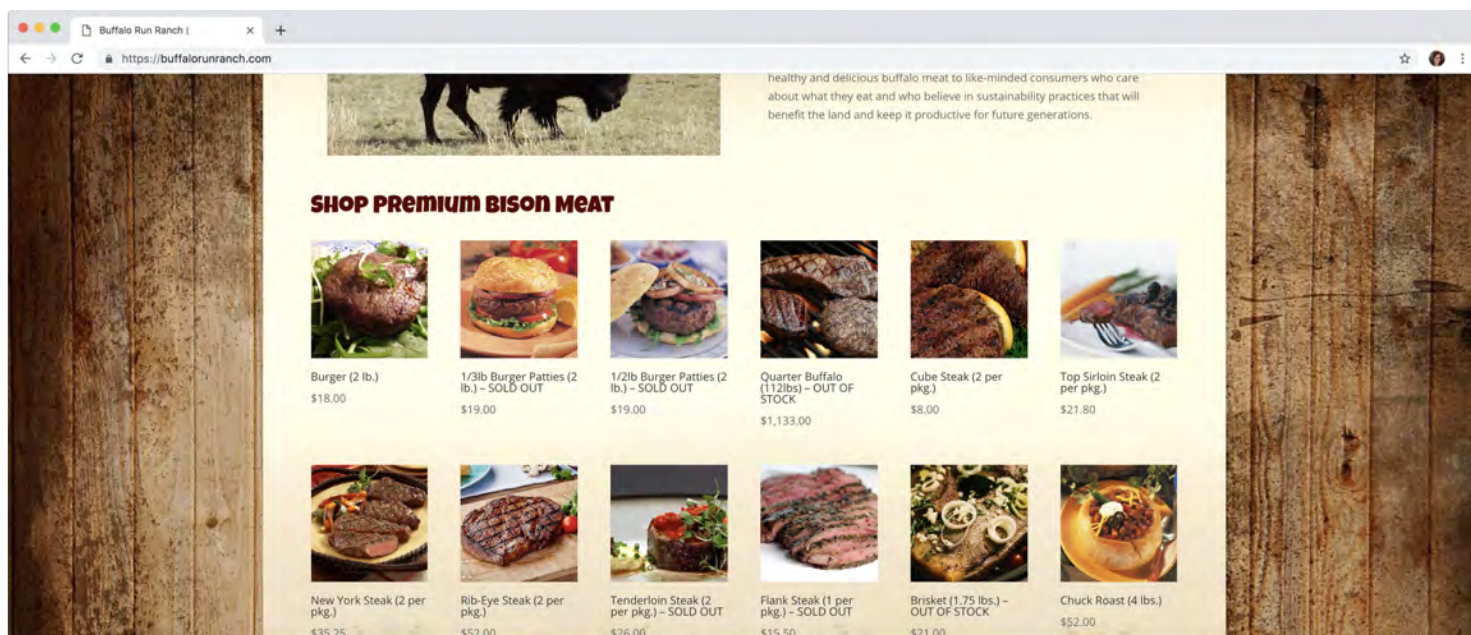


### Image Name

BeefCubeSteakGrI Mrk001

### Registration Number

VA0002012581





Adlife Marketing & Communications Co., Inc.  
38 Church St • Pawtucket, RI 02860  
Phone: (401) 723-4782

**Re: Claim Number: 4326407502212033489**  
**FRE 408 SETTLEMENT COMMUNICATION**

Thursday, May 2, 2019

**Buffalo Run Ranch**

4611 E Bench Creek Rd  
Woodland, UT 84036

Dear Buffalo Run Ranch,

You are receiving this correspondence because you may have used the attached image unlawfully.

The image in question is owned by Adlife Marketing & Communications Co., Inc. and was discovered on your website. This image is part of our library of images protected under copyright. Attached is a copy of the image, pertinent information regarding Adlife's proof of ownership, along with the usage of this image on your company's website. If you have a license, please contact us immediately with a copy of that license at [licensing@adlife.com](mailto:licensing@adlife.com).

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We look forward to your prompt response to this matter.

Sincerely,

Rebecca M. Jones  
Adlife Licensing Department  
401-543-7553

PreparedFoods\_000058



Adlife Marketing & Communications Co., Inc.  
38 Church St • Pawtucket, RI 02860  
Phone: (401) 723-4782

Re: Claim Number: 4326407502212033489  
FRE 408 SETTLEMENT COMMUNICATION

Thursday, May 2, 2019

### Company Name

Buffalo Run Ranch

### Company Address

4611 E Bench Creek Rd  
Woodland, UT 84036

### Company Phone Number

435-200-9360

### URL Containing Image

<https://buffalorunranch.com/product-category/steaks>

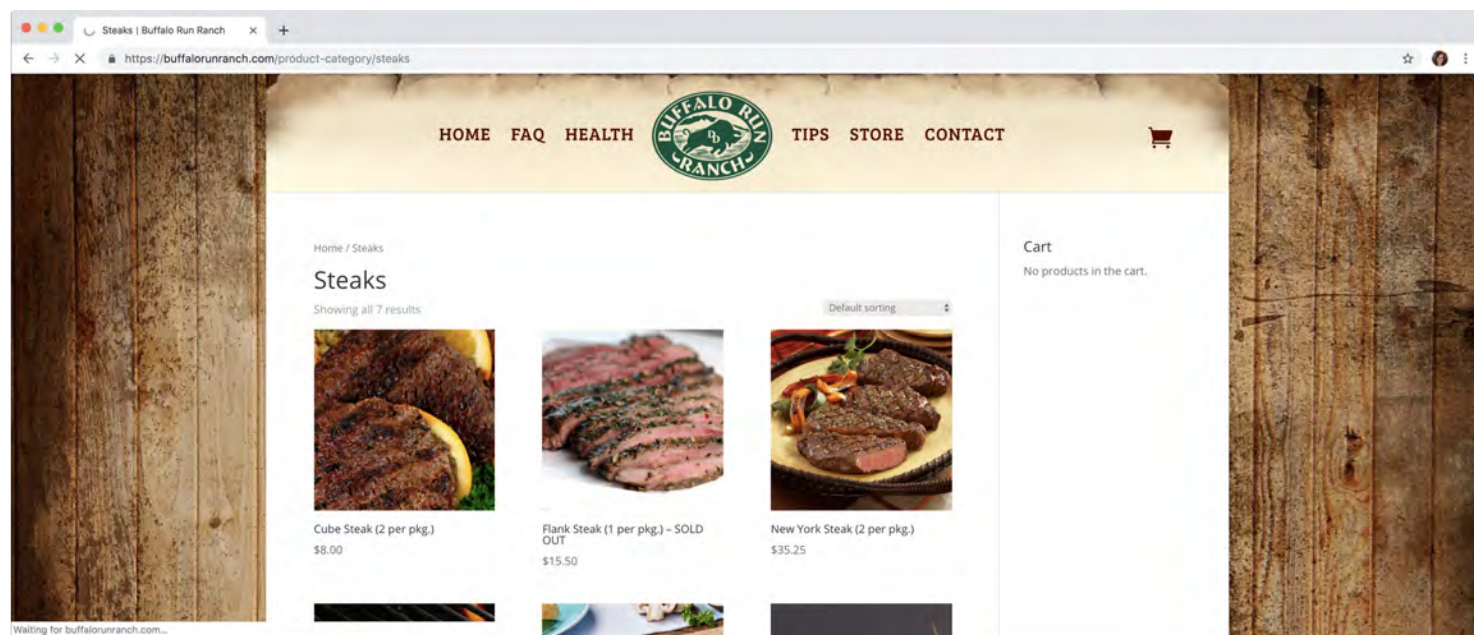


### Image Name

BeefCubeSteakGrIMrk001

### Registration Number

VA0002012581







Adlife Marketing & Communications Co., Inc.  
38 Church St • Pawtucket, RI 02860  
Phone: (401) 723-4782

Re: Claim Number: 4333239250831257821  
FRE 408 SETTLEMENT COMMUNICATION

Friday, May 10, 2019

**Meridian Magazine**

409 N. Country Manor Lane  
Alpine, UT 84004.

Dear Meridian Magazine,

You are receiving this correspondence because you may have used the attached image unlawfully.

The image in question is owned by Adlife Marketing & Communications Co., Inc. and was discovered on your website. This image is part of our library of images protected under copyright. Attached is a copy of the image, pertinent information regarding Adlife's proof of ownership, along with the usage of this image on your company's website. If you have a license, please contact us immediately with a copy of that license at [licensing@adlife.com](mailto:licensing@adlife.com).

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Please note that your failure to respond to this notice may result in further legal action. If you believe this letter has reached you in error, please contact Adlife Licensing Department at [licensing@adlife.com](mailto:licensing@adlife.com). This letter is without prejudice to Adlife's rights and remedies, all of which are expressly reserved.

We look forward to your prompt response to this matter.

Sincerely,

A handwritten signature in black ink that reads "David W. Higgins".

David W. Higgins  
Adlife Licensing Department  
617-775-3289

PreparedFoods\_000060



Adlife Marketing & Communications Co., Inc.  
38 Church St • Pawtucket, RI 02860  
Phone: (401) 723-4782

Re: Claim Number: 4333239250831257821  
FRE 408 SETTLEMENT COMMUNICATION

Friday, May 10, 2019

## Company Name

Meridian Magazine

## Company Address

409 N. Country Manor  
Lane Alpine, UT 84004.

## Company Phone Number

202-714-5775

## URL Containing Image

<https://latterdaysaintmag.com/article-1-14809/>



## Image Name


PotatoAsst001\_ADL

## Registration Number

VA0002033004


→ Secure | <https://latterdaysaintmag.com/article-1-14809/>


slices before baking. We used that as a starting point. We made several casseroles by boiling the potato slices until they were crisp tender and assembling them in baking dishes. We were disappointed. The casseroles turned out with over-cooked, mushy potatoes. They tasted bland and the casseroles were watery. We concluded that the boiling bleached out much of the potato flavor and the water diluted the casseroles. We found that if we sliced the potatoes thinly — about 1/8-inch or a little thicker—they would cook evenly without par cooking.





It's important that you slice the potatoes uniformly. If you don't, your casserole won't cook evenly: the thin slices will be mushy while the thick slices will be hard. The only way to cut the slices evenly is with a mechanical slicer. Our slicer of choice is a mandoline.


*By Maurine Proctor*

 Fine-Tuning: Church Updates Guidelines for New Hymnbook and Children's Songbook Submissions  
*By Official Church Newsroom*

 What Do We Know About the "Anthon Transcript"?  
*By Book of Mormon Central*

 "You Are Enough": New Church Video Celebrates Mothers  
*By Church of Jesus Christ of Latter-day Saints*

 How the Impossible Became Possible: "Close up" picture finally taken of massive black hole  
*By Ronald P. Millett*

 Cartoon: Mother's



Adlife Marketing & Communications Co., Inc.  
38 Church St • Pawtucket, RI 02860  
Phone: (401) 723-4782

Re: Claim Number: 4458764402212268911  
FRE 408 SETTLEMENT COMMUNICATION

Wednesday, October 2, 2019

**Company Name**

Caley's Catering & Events

**Company Address**

PO Box 104  
Draper, Utah 84020

**Company Phone Number**

801-231-5250

**URL Containing Image**

<https://caleyscatering.com/lite-menu-options/>

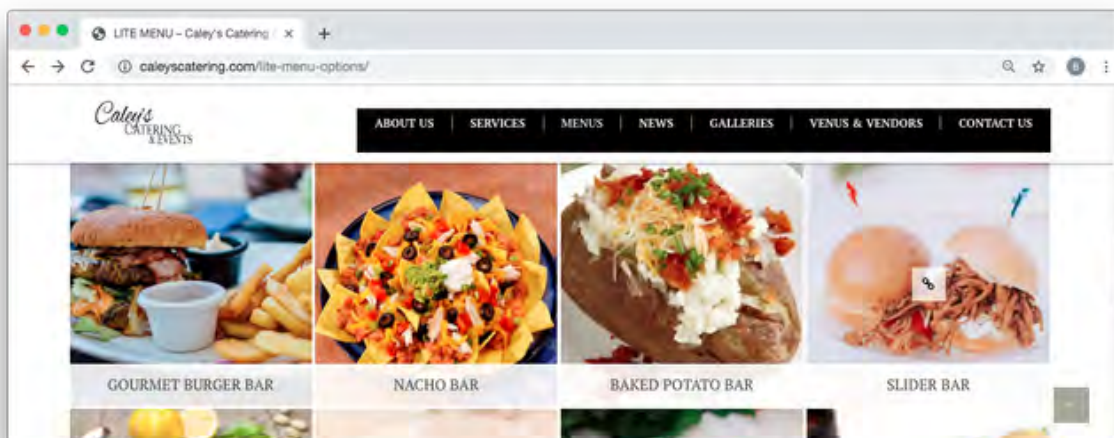


**Image Name**

PotatoBaked013

**Registration Number**

VA0002019412





Adlife Marketing & Communications Co., Inc.  
38 Church St • Pawtucket, RI 02860  
Phone: (401) 723-4782

Re: Claim Number: 4475837350836351913  
FRE 408 SETTLEMENT COMMUNICATION

Tuesday, October 22, 2019

**Company Name**

ACR International, LLC

**Company Address**

223 West 1230 North #102  
Provo, Utah 84604

**Company Phone Number**

(855) 648-1230

**URL Containing Image**

<https://www.acrllc.com/freerecipes.html>

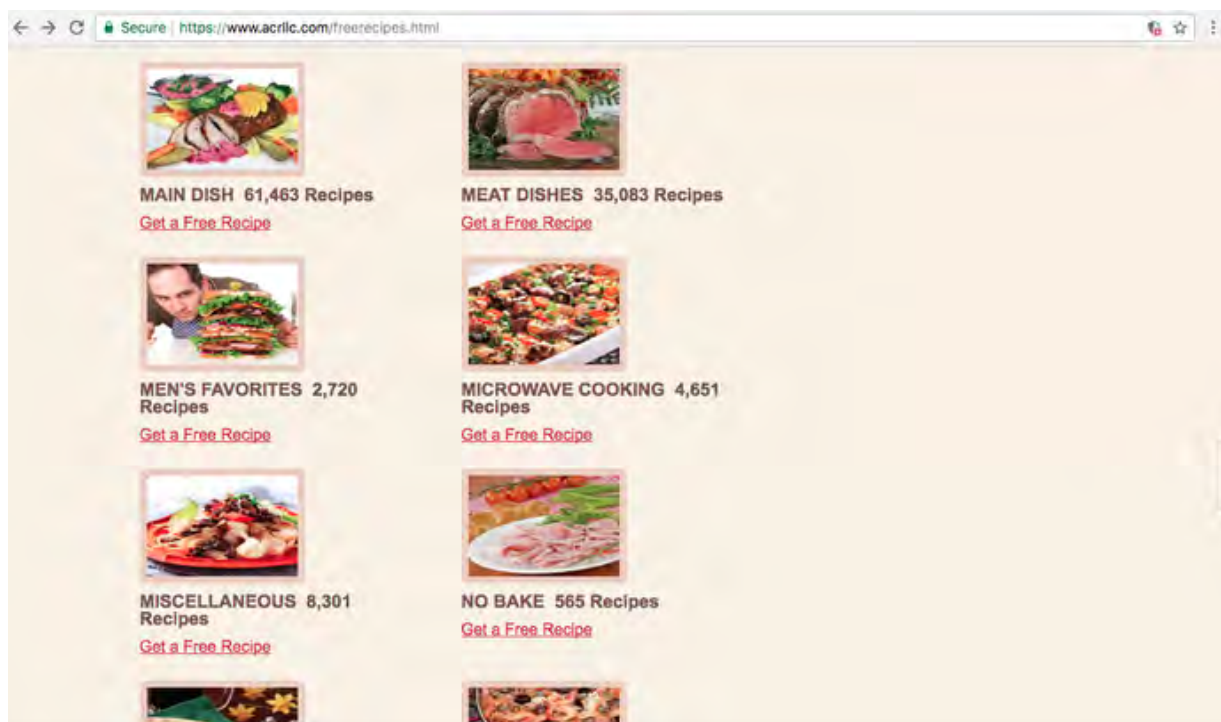


**Image Name**

BeefRibRoast004.jpg

**Registration Number**

VA0002009665







Adlife Marketing & Communications Co., Inc.  
38 Church St • Pawtucket, RI 02860  
Phone: (401) 723-4782

Re: Claim Number: 4791969350837067739  
FRE 408 SETTLEMENT COMMUNICATION

Thursday, October 22, 2020

**Company Name**

Lee's Marketplace

**Company Address**

555 E 1400 N  
Logan, UT 84341

**Company Phone Number**

(435) 755-5100

**URL Containing Image**

<https://digitalcommons.usu.edu/cgi/viewcontent.cgi?article=1080&context=newspapers>



**Image Name**

Carrots0409.

**Registration Number**

VA0002023644







PreparedFoodPhotos.com  
P.O. Box 1000 • Slatersville, RI. 02876  
licensing@PreparedFoodPhotos.com  
1-866-609-1548

Re: Claim Number: 4928247536832078598  
FRE 408 SETTLEMENT COMMUNICATION

Monday, March 29, 2021

**Company Name**

Big Daddy's Direct

**Company Address**

45 E 300 N  
Monroe, UT 84754

**Company Phone Number**

(435) 231-1319

**URL Containing Image**

<https://www.facebook.com/Big-Daddys-Direct-Cedar-City-Utah-106257547691122/>

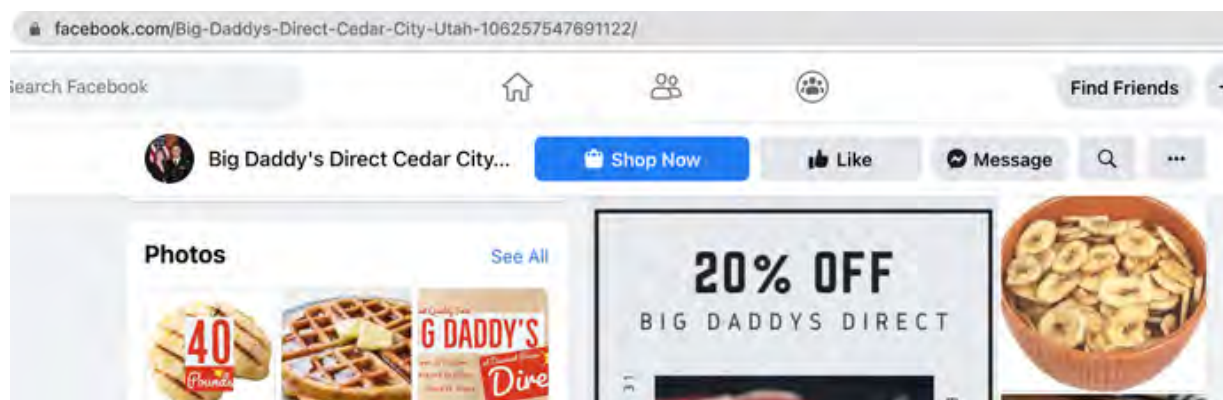


**Image Name**

BananaChipsHR0611.

**Registration Number**

VA0002024712





PreparedFoodPhotos.com  
P.O. Box 1000 • Slatersville, RI. 02876  
licensing@PreparedFoodPhotos.com  
1-866-609-1548

Re: Claim Number: 5075335546834507023  
FRE 408 SETTLEMENT COMMUNICATION

Wednesday, September 15, 2021

**Company Name**

Utah Education Network

**Company Address**

101 Wasatch Drive  
Salt Lake City, UT 84112

**Company Phone Number**

(801) 585-6013

**URL Containing Image**

<https://www.uen.org/tv/cheese/>



**Image Name**

CheeseGouda004\_ADL

**Registration Number**

VA0002027767





PreparedFoodPhotos.com  
P.O. Box 1000 • Slatersville, RI. 02876  
licensing@PreparedFoodPhotos.com  
1-866-609-1548

Re: Claim Number: 5088329106838228340  
FRE 408 SETTLEMENT COMMUNICATION

Thursday, September 30, 2021

**Company Name**

Intermountain Healthcare

**Company Address**

36 S State Street  
Salt Lake City, Utah 84111

**Company Phone Number**

(801) 442-3430

**URL Containing Image**

<https://intermountainhealthcare.org/blogs/topics/live-well/2013/11/what-could-you-eat-if-you-didnt-have-that-drink/>



**Image Name**

CheeseBall004

**Registration Number**

VA0002014921





PreparedFoodPhotos.com  
P.O. Box 1000 • Slatersville, RI. 02876  
licensing@PreparedFoodPhotos.com  
1-866-609-1548

Re: Claim Number: 5135669566612740464  
FRE 408 SETTLEMENT COMMUNICATION

Wednesday, November 24, 2021

**Company Name**

University of Utah Health

**Company Address**

50 North Medical Drive  
Salt Lake City, UT 84132

**Company Phone Number**

801-581-2121

**URL Containing Image**

<https://healthcare.utah.edu/healthfeed/postings/2015/04/>



**Image Name**

PizzaBites002.

**Registration Number**

VA0002017741





PreparedFoodPhotos.com  
P.O. Box 1000 • Slatersville, RI. 02876  
licensing@PreparedFoodPhotos.com  
1-866-609-1548

Re: Claim Number: 5140229336214057146  
FRE 408 SETTLEMENT COMMUNICATION

Monday, November 29, 2021

**Company Name**

Dry Lakes Ranch Beef

**Company Address**

73 North Main Street  
PO Box 1561  
Parowan, Utah 84761

**Company Phone Number**

435-559-1561

**URL Containing Image**

<https://www.drylakesranchbeef.com/product-page/boneless-chuck-roast>



**Image Name**

BeefChuckRoastBnls001.jpg

**Registration Number**

VA0002022602



https://www.drylakesranchbeef.

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Home / Boneless Chuck Roast (3 sizes available)



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Wednesday, January 5, 2022

**Company Name**

The Company Grill

**Company Address**

5185 Frontier Dr,  
Mountain Green, Utah, 84050

**Company Phone Number**

(801) 309-0952

**URL Containing Image**

<https://companygrill.com/memphis-style-bbq/>

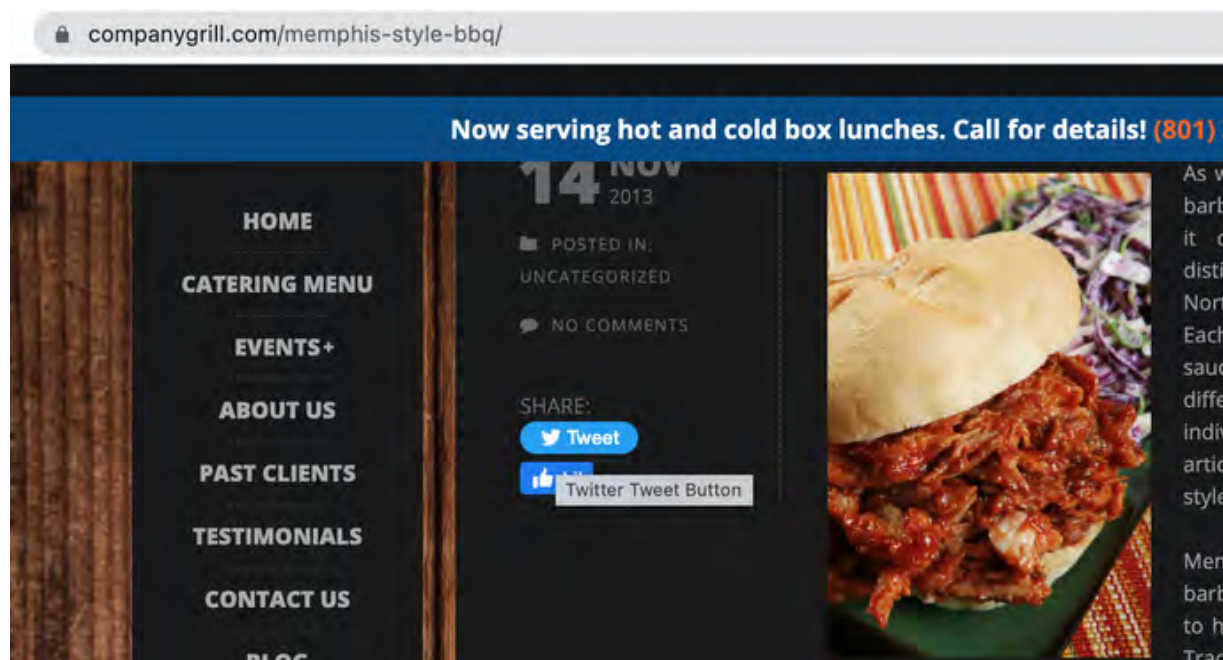


**Image Name**

ChickenSandwichBBQ002.

**Registration Number**

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Wednesday, July 27, 2022

**Company Name**

NUTRIEX, LLC

**Company Address**

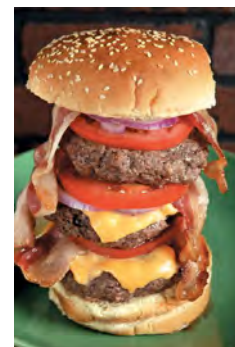
1055 East 2100 South, Suite 203  
Salt Lake City, Utah 84106

**Company Phone Number**

888-(688-7439)

**URL Containing Image**

<https://nutriex.com/nutriex-insights/cancer-prevention/>

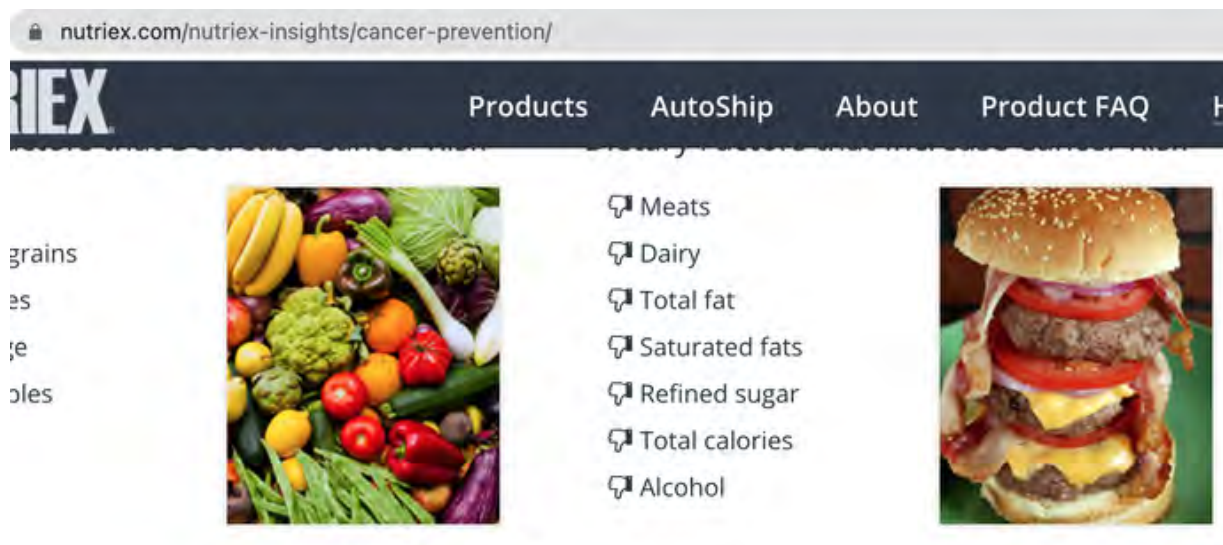


**Image Name**

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**Registration Number**

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FRE 408 SETTLEMENT COMMUNICATION

Wednesday, November 30, 2022

**Company Name**

8coupons inc.

**Company Address**

PO Box 70614,  
Salt Lake City, Utah, 84101

**Company Phone Number**

(212) 656-1589

**URL Containing Image**

<https://www.8coupons.com/stores/local/we-deliver-cookeville-38501>



**Image Name**

WrapTurkey004.

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Friday, June 30, 2023

**Company Name**

Easy Chef's One Million Recipes

**Company Address**


ACR International, LLC  
223 West 1230 North#102  
Provo, Utah 84604

**Company Phone Number**

855-648-1230

**URL Containing Image**

<https://onemillionrecipes.com/free-recipes.html>

 Screen Shot 2023-06-30 at 4.13.15 PM.png



**Image Name**

BeefRibRoast004.jpg

**Registration Number**

VA0002009665



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Alliance Health Networks  
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Salt Lake City, UT 84111

#### Phone #:

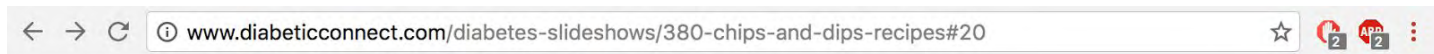
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Meats/Beef/BeefDinner/CornedBeefDinner001\_AD  
L

#### URL Containing Copyrighted Images:

<http://www.diabeticconnect.com/diabetes-slideshows/380-chips-and-dips-recipes#20>



are healthy, diabetic-friendly recipes to help you eat these  
appetizers in good conscience.



#### St. Patrick's Day Recipes

St. Patrick's Day is full of festivities, green and celebrating the luck of the Irish with some delicious food. Here are tasty, diabetic-friendly Irish recipes for your enjoyment.

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#### Mailing Address:

Associated Food Stores, Inc  
 1850 W 2100 S  
 Salt Lake City Utah 84119

#### Phone #:

801 973 4400

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<http://cashcarryfoods.com/promotions/115?banner=true>



The screenshot shows the Cash & Carry Market website. The header includes the logo "Cash & Carry MARKET YOUR HOMETOWN GROCER" and navigation links: Weekly Ad, In Store, Recipes, Produce Glossary, Deli Specials, and Contact Us. A sidebar on the right contains links to Deli Specials, Store Information, Our Services, and Need Something Special? (with a text block about product availability and a cost-plus policy). At the bottom of the sidebar is a "Get Email Reminders" section with contact information for advance notice of specials.

### Corned Beef and Cabbage

Make a festive dinner this St. Patrick's Day with Corned Beef and Cabbage.

**What you need:**

- 4-5 pound corned beef brisket
- 1 small onion, quartered
- 5 crushed garlic cloves
- 3 cups water
- 8 oz ginger ale
- 2 Tablespoons sugar
- 2 Tablespoons vinegar
- Corned beef seasoning packet
- 1 pound carrots
- 1 pound red potatoes
- 1 head of cabbage

**What you do:**

1. Place onions and garlic in the bottom of a medium to large slow cooker. Place beef on top of garlic and onions (beef should not touch the bottom of the slow cooker).
2. Combine water, sugar, vinegar, and ginger ale. Pour on brisket. Take seasoning packet and pour on beef.
3. Cook on low for 4 hours, and then add chopped potatoes and carrots. Cook for another 4 hours (8 hours total.) On the 7th hour, add cabbage.

**Deli Specials**

**Store Information**

**Our Services**

**Need Something Special?**

With hundreds of thousands of products available today, we are not able to stock everything in our store. However, if you need something that we do not carry, please let us know. If possible, we can bring the item in, OR you can always have us special order a case for you at our cost, plus 10%.

**Get Email Reminders**

Join our e-mail list for advance notice about our daily homemade soup specials by e-mailing us or calling Carla at 983-0190



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Linda Isom  
 414 S 1125 W  
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#### Phone #:

801 593 9566

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Image: Ethnic/TexMex/Taquito003

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Welcome! I'm Linda Isom, professional organizer, small business owner, wife, mother and lover of all aspects of organization. Just like everyone else, I am a work in progress. Here you will find helpful organizing tips, informative discussions, creative solutions to everyday organizing problems and much more. Thanks for stopping by and come back often to see what's new!

SEARCH THIS BLOG

WEDNESDAY, NOVEMBER 25, 2009

**How to plan a successful, stress free holiday party**

Here we are again at the time of year the decorations, the presents, the hype, the STRESS! Like many of you, I am hosting a few holiday parties. Here are a few tips on making your preparations stress free:

Send Invitations( Ideally 2 weeks to 10 days before the party):

2. Make things simpler by having your guests RSVP only if they are not attending.

Make Lists(write these down all in the same place. And again, the earlier the better):

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#### Phone #:

801 355 6002

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<http://www.diabeticconnect.com/diabetes-slideshows/272-diabetic-friendly-pizza-party-recipes#2>



Image: Pizza\_Calzone/Pizza/PizzaCheese008

Home / Diabetic-Friendly: Pizza Party Recipes

### Diabetic-Friendly: Pizza Party Recipes

The only thing better than pizza is more pizza! In honor of Cheese Pizza Day on September 5th, we've gathered 16 diabetic-friendly pizza recipes with all your favorite toppings. Fire up the oven!

[Previous](#) 2 / 15 [Next](#)

#### Two Cheese Pizza

The delicious flavor combinations in this homemade pizza will leave your taste buds screaming for more!

- Serving Size - 2 slices
- Calories - 351
- Carbohydrates - 34g
- Fat - 16g
- Protein - 18g

[View Recipe](#)

**You Might Also Like**

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### Creamy Crab Dip

Crab dip is a great party treat and this one is perfect for entertaining because it's best if made several hours in advance. If you're on a budget, try imitation crab. With all the spices in this dip it's hard to tell the difference.

Be the first to rate this recipe!

Rate & Comment Save to Favorites

recipe Comments Related Items Most Popular

#### Ingredients

- 8 ounces cream cheese, at room temperature
- 1/2 cup chili sauce
- 1 teaspoon lemon juice
- 1/2 teaspoon Tabasco, or to taste
- 8 ounces lump crab meat
- 4 green onions, thinly sliced

In a medium bowl combine all ingredients. Stir well to combine. Serve immediately with crackers or bread slices, or refrigerate for up to 24 hours. Bring to room temperature before serving.

Food Advertising by

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# Harley & Buck's Great American Cuisine

### Mailing Address:

Harley & Buck's Great American Cuisine  
 2432 Washington Blvd.  
 Ogden, UT 84401

### Phone #:

801 745 2060

### URL Containing Copyrighted Image:

<http://harleyandbucks.com/menu/>



Image: ChickenCooked/Wing/ChickenWingHot007

The screenshot shows the website's menu page. At the top is the navigation bar with links: HOME, ABOUT, MENU, EVENTS, NEWS, CATERING, and CONTACT. Below the navigation bar is a horizontal menu with categories: Soups, Salads, Sandwiches, Pastas, Steaks, BBQ, Seafood, Chicken, Sides, Kids Menu, and Desserts. The main content area is divided into two columns. The left column is titled 'APPETIZERS' and features a large image of chicken wings. Below the image are two items: 'FRESH CAPRESE STACK' for \$8 and 'BLAIR'S NACHOS' for \$10. The right column is titled 'DAILY SPECIALS' and lists specials for Monday through Saturday. Monday's special is 'Harley's famous hamburgers with wings and fries; choice of wing sauce' for \$15. Tuesday is 'CIOPINNO NIGHT' with a 'Rich seafood stew with fresh fish, shrimp and clam' for 'call for details'. Wednesday is 'ALL YOU CAN EAT RIBS' for \$19. Thursday, Friday, and Saturday have a 'Fresh oyster bar, kumamoto, blue points' for 'call for details'. Friday and Saturday also feature 'PRIME RIBS' for \$24. At the bottom of the right column is a section titled 'SOUP'.

**APPETIZERS**

**FRESH CAPRESE STACK**  
 Fresh Mozzarella, tomato, fresh basil, Balsamic glaze  
 and shredded Parmesan. .... \$8

**BLAIR'S NACHOS**  
 Tortilla chips piled high with cheddar jack cheese,  
 jalepenos, brisket, pico de gallo, and sour cream. .... 10

**DAILY SPECIALS**

**MONDAY**  
 Harley's famous hamburgers with wings and fries;  
 choice of wing sauce. .... \$15

**TUESDAY CIOPINNO NIGHT**  
 Rich seafood stew with fresh fish, shrimp and clam *call for details*

**WEDNESDAY ALL YOU CAN EAT RIBS**  
 Join us for All You Can Eat spare ribs ..... \$19

**THURSDAY, FRIDAY & SATURDAY**  
 Fresh oyster bar, kumamoto, blue points. .... *call for details*

**FRIDAY & SATURDAY PRIME RIBS**  
 Prime Rib. Utah's finest smoked prime rib with all of  
 the trimmings. .... \$24

**SOUP**



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 86 N. University Ave. #300  
 Provo, UT 84601

#### Phone #:

801 373 5050

#### URL Containing Copyrighted Image:

[http://www.heraldextra.com/entertainment/dining/places-in-utah-county-to-celebrate-national-pretzel-day/collection\\_55752852-0ab9-5704-8f78-6c7e90dcbbd5.html](http://www.heraldextra.com/entertainment/dining/places-in-utah-county-to-celebrate-national-pretzel-day/collection_55752852-0ab9-5704-8f78-6c7e90dcbbd5.html)



Image: /Chip\_Popcorn\_Snack/PretzelSoft001

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## 8 places in Utah County to celebrate National Pretzel Day

Apr 26, 2016 (0)

f t e p v

Tuesday is National Pretzel Day, and if you get as excited about pretzel day as Michael Scott from "The Office," here are eight places to visit in Utah County.

PREV

Next

#### Latest in section

- Recently Reviewed: Pizzeria Limone, OTEO and Cafe on Fire
- 10 restaurants that serve up some spice in Utah County
- Drive-Thru Gourmet: Wendy's new salad keeps it the leader of the fast-food salad pack
- Molly's in Provo brings home-cooked goodness to your lunch hour
- Food truck schedules: The go-to list for your favorite food trucks

#### Most Popular

- Molly's in Provo brings home-cooked goodness to your lunch hour
- Drive-Thru Gourmet: Wendy's new salad keeps it the leader of the fast-food salad pack
- Pizzeria Limone is not your father's pizza parlor

1 Auntie Anne's

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#### Mailing Address:

JMH Premium  
 1389 Center Drive  
 Suite 340  
 Park City, UT 84098

#### Phone #:

888 741 4564

#### URL Containing Copyrighted Image:

<http://www.jmhpremium.com/sauces/>



Image: Produce/Vegetables/Broccoli/BroccoliCheese002

The screenshot displays the JMH Premium website's 'sauces' page. The navigation bar includes links for Home, Products, Services, Recipes, FAQ, Contact Us, and Product Matrix. The main content area features several product listings, each with a title, item number, and a description. The products shown are:

- Finishing Sauces:** A section header with a description of the quality and consistency of the sauces.
- Hollandaise Sauce Mix (Item: 49136):** Described as a dry powder mix that creates a rich, satiny sauce when combined with milk and butter.
- Instant Alfredo Sauce Mix (Item: 49208):** Described as a traditional aged parmesan cream sauce mix that is easy to prepare by boiling water and whisking.
- Cheese Sauce Mix (Item: 92046):** Described as a viscous cheese sauce mix that can be used as a topping for potatoes or vegetables, or as a base for soup.
- Sauce Assistance:** A section header with a description of how the sauce mixes can be used to create delectable dishes.

The website also features several images of food dishes, including a bowl of soup, a plate of pasta, and a bowl of broccoli with cheese sauce.



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### Petersons Fresh Market

#### Physical Address:

Petersons Fresh Market  
 1784 West 12600 South  
 Riverton, UT 84065

#### Phone #:

801 254 5829

#### URL Containing Copyrighted Image:

<http://petersonsfreshmarket.com/departments/signature-items>



The screenshot displays the website [petersonsfreshmarket.com/departments/signature-items](http://petersonsfreshmarket.com/departments/signature-items). The page features several sections for signature items:

- Peterson's Deli Salsa:** Made fresh in-store from hand-picked ingredients. This salsa is a convenient way to add an authentic flavor to your table.
- Ground Beef Patties:** Peterson's signature Lean ground beef is ground fresh daily. Add this ready-made 1/4 lb. patty for a fresh addition to your next barbeque or tail-gate party. Lean ground 100% USA beef from a butcher your family can trust.
- Bratwurst:** Peterson's signature bratwurst is made from pork shoulder and many varieties of seasonings. We have several varieties of bratwurst including: German, Andouille, Thai Mango and Original.

Each item section includes a "Watch how our [item] is made" button. On the right side of the page, there is a "Pharmacy Hours" section, a "Store Address" (1784 West 12600 South, Riverton, UT 84065), a map showing the store location, and a "What's New on facebook" section.



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### Rocky Mountain Fine Foods

#### Mailing Address:

Rocky Mountain Fine Foods  
1304 N Redwood Rd  
Saratoga Springs, UT 84045

#### Phone #:

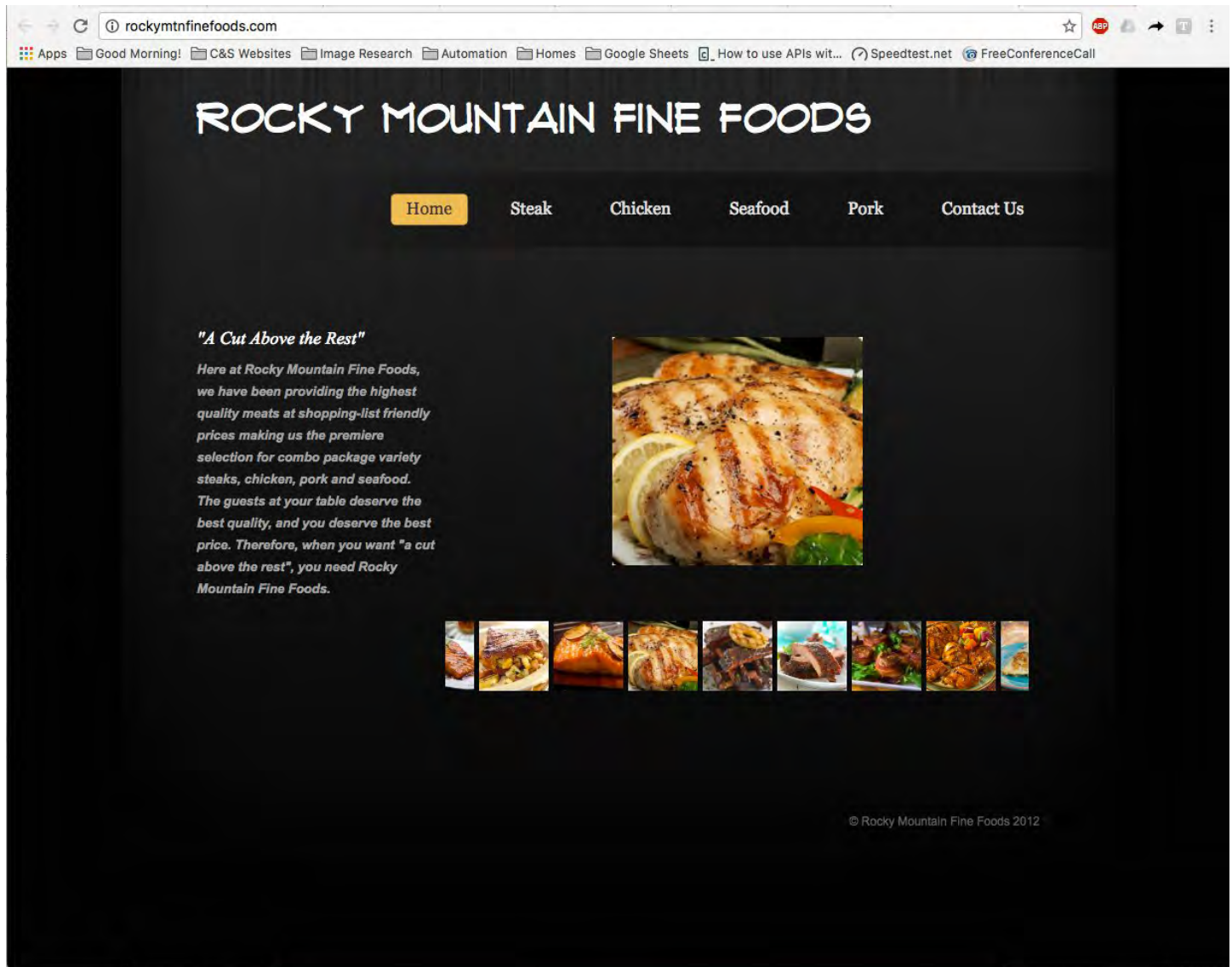
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Image: ChickenCooked/Breast/ChickenBreastBnlsGrIMrk021



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# CompanyName

ThermoWorks, Inc.

## Address

JThermoworks Inc  
 1762 West 20 South # 100  
 Lindon, UT 84042

## Email Address:

[info@thermoworks.com](mailto:info@thermoworks.com)

## Phone #:

801 756 7705

## URL Containing Copyrighted Image:

<http://www.recipeion.com/Turkey-Recipes/Simple-Roasted-Turkey>



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Home > Turkey > Simple Roasted Turkey

### Simple Roasted Turkey

By: [ThermoWorks](#)

Notes Save Recipe Comment

★★★★★ 12 Comments

With this easy-to-follow recipe, making a turkey has never been easier. Simple Roasted Turkey is a delicious yet easy turkey recipe that explains how to make the perfect turkey for the holidays or anytime. Simply season and stuff the turkey, then roast to perfection. When it's done, it will have amazing flavor and won't dry out at all. Follow this simple turkey recipe for Christmas dinner or a family meal and you'll learn the secret to making the perfect roasted turkey.

**Cooking Time:** 1 hr

**Ingredients**

- 1 15-pound turkey
- 1 stick butter
- Parsley, sage, rosemary, thyme, salt, pepper (to taste)
- 1 onion, chopped
- 3 ribs celery, chopped
- 2 medium carrots, chopped

**Instructions**

1. Frozen from the supermarket, thaw your turkey in its unopened wrapping in the fridge (set to 37°F) and allow one day for every 5lbs of meat. A 15lb bird will need 3 days.
2. The turkey will be sufficiently thawed when the internal temperature registers between 37 to 41°F. After thawing, pat the turkey dry. If any of the skin is left wet it will turn out mottled after it is cooked.

Simple Roasted Turkey

This image courtesy of ThermoWorks

**What's Hot**

1. Kentucky Hot Bake
2. "Hamburger" Stroganoff From Scratch
3. Best Easy Herb Roasted Turkey
4. Diner Style Meat Loaf
5. Meatloaf and Potatoes "Cupcakes"
6. Hearty Healthy Stuffed Peppers
7. Weeknight Turkey Pot Pies
8. 9 Top Notch Turkey Pot Pies
9. 24 Turkey Recipes: Ground Turkey Recipes and More
10. 8 Easy Turkey Recipes for Your Thanksgiving Feast

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Use the "Save Recipe" button to add a recipe to your Recipe Box.

[Click here to see the items in your Recipe Box.](#)

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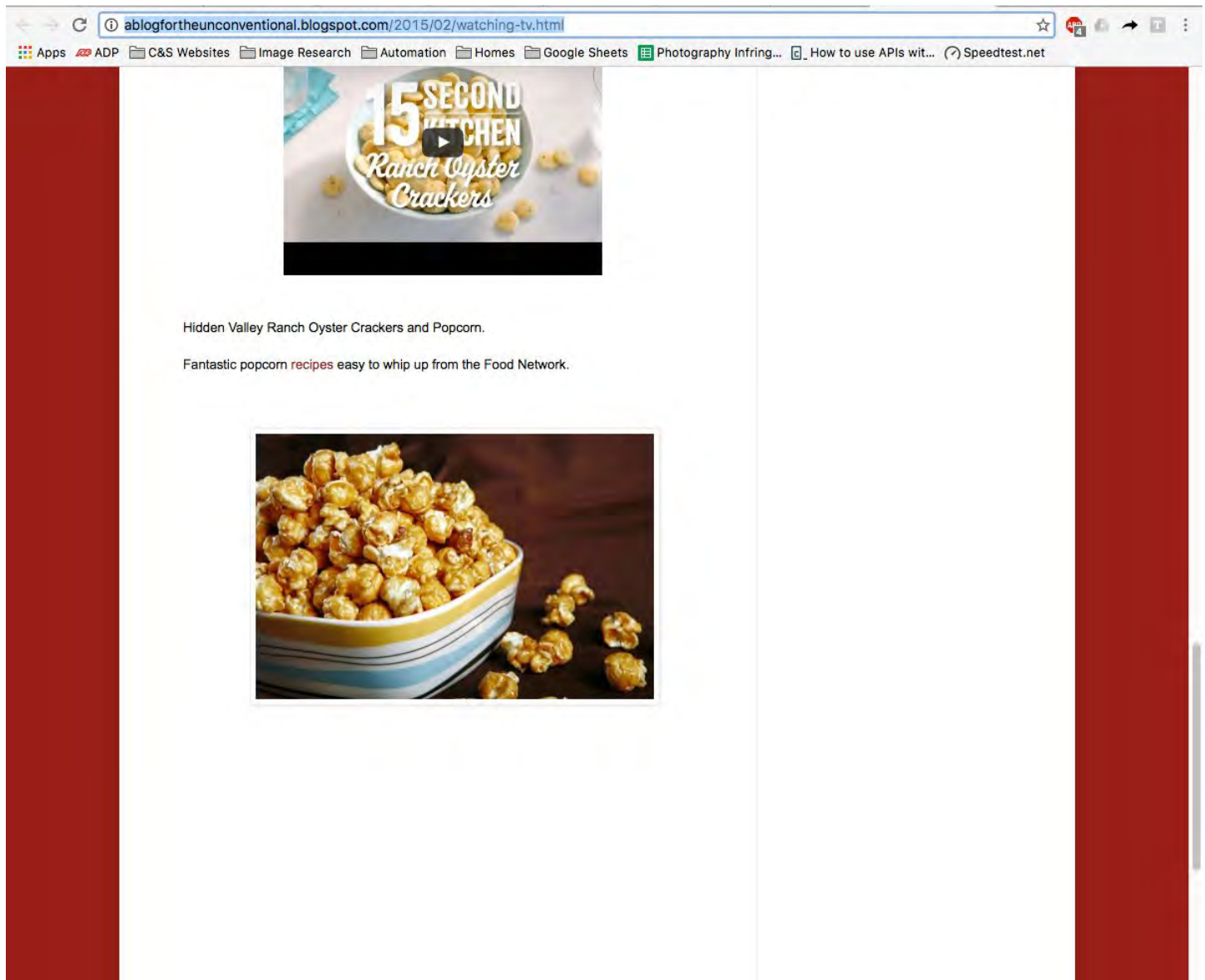
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Image: /Chip\_Popcorn\_Snack/PopcornCaramelPeanut001



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 1412 N 350 W  
 Clearfield, UT 84015-2817

#### Phone #:

801 525 8941

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<http://wasatchfoodservices.com/AdditionalMenuChoices.htm>



Additional Menu Choices

- Grilled Honey Glazed Chicken Sandwiches & 1/4 Steak Hamburgers for \$7.95
- Barbequed Shredded Pork Sandwiches for \$7.95
- Grilled Chicken Sandwiches & BBQ Shredded Pork Sandwiches for \$8.95
- 1/4 lb. Steak Hamburgers & Jumbo Kosher Hotdogs for \$6.95
- 1/4 lb Hamburgers & BBQ Pulled Pork \$7.95
- Teriyaki Steak & Hawaiian Chicken for \$9.95
- Fresh Grilled Salmon & Honey Glazed Grilled Chicken Filet for \$10.95
- Fresh Grilled Salmon & Bacon Wrapped Sirloin Steak for \$12.95

All of the Above Menu Choices Include Two Sides "As listed on Main Course"



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Alliance Health Networks  
 10855 S. Riverfront Pkwy  
 Suite 100  
 South Jordan, UT 84095

#### Phone #:

801 355 6002

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<http://www.diabeticconnect.com/diabetes-slideshows/272-diabetic-friendly-pizza-party-recipes#2>



Image: Pizza\_Calzone/Pizza/PizzaCheese008

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Home / Diabetic-Friendly: Pizza Party Recipes

### Diabetic-Friendly: Pizza Party Recipes

Previous 2 / 15 Next

The only thing better than pizza is more pizza! In honor of Cheese Pizza Day on September 5th, we've gathered 16 diabetic-friendly pizza recipes with all your favorite toppings. Fire up the oven!

#### Two Cheese Pizza

The delicious flavor combinations in this homemade pizza will leave your taste buds screaming for more!

- Serving Size - 2 slices
- Calories - 351
- Carbohydrates - 34g
- Fat - 16g
- Protein - 18g

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September 30th, 2016



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Coral Springs, FL 33065

T 877-HERO-CAT (877-437-6228)  
E [help@copycatlegal.com](mailto:help@copycatlegal.com)

## FRE 408 SETTLEMENT COMMUNICATION

January 26, 2022

**VIA FEDERAL EXPRESS AND ELECTRONIC MAIL**  
**([DryLakesRanchBeef@gmail.com](mailto:DryLakesRanchBeef@gmail.com)):**

Dry Lakes Ranch Beef, LLC  
Attn: Kacie Carballo  
73 North Main Street  
PO Box 1561  
Parowan, Utah 84761

***RE: Prepared Food Photos, Inc. v. Dry Lakes Ranch Beef, LLC***

Dear Ms. Carballo:

This law firm represents Prepared Food Photos, Inc. Our client is in the business of licensing high-end, professional photographs for the food industry. Through its website ([www.preparedfoodphotos.com](http://www.preparedfoodphotos.com)), our client offers a monthly subscription service which provides access to/license of tens of thousands of professional images. The rights associated with these images are exclusively owned by our client, and it has spent countless hours and substantial monies in building a business that relies on such exclusive subscription service. The unauthorized use of our client's work deprives our client of much-needed income and forces our client to incur substantial costs (monetary and time) in identifying violators and enforcing its rights.

In 1994, our client created a photograph titled "BeefChuckRoastBnls001" (the "Work"). A copy of the Work is exhibited below:



The Work was registered by our client with the Register of Copyrights on November 18, 2016 and was assigned Registration No. VA 2-022-602. A true and correct copy of the Certification of Registration pertaining to the Work is attached hereto as **Exhibit “A.”**

To our knowledge, our client ***did not*** authorize you or your company to use and/or display the subject photograph. Notwithstanding this lack of authorization, our client has identified the subject photograph currently published by Dry Lakes Ranch Beef, LLC. for commercial purposes (<https://www.drylakesranchbeef.com/product-page/boneless-chuck-roast>):



A true and correct copy of the screenshot from Dry Lakes Ranch Beef, LLC.'s website, displaying the copyrighted Work, is attached hereto as **Exhibit “B.”**

If our client is mistaken or if you believe the photograph was previously licensed through our client or some other party, please contact us immediately with evidence of the prior licensing. If we do not hear from you ***within fourteen (14) days from the date of this letter***, we will be forced to assume that the photograph was ***not*** properly licensed and will take appropriate legal action to enforce our client's rights.

If the above-described use of our client's photograph was not properly licensed, please understand that such unauthorized use may constitute federal copyright infringement under 17 U.S.C. § 501. In such event, I encourage you to discuss the foregoing with your attorney and/or your insurance carrier as copyright infringement is a serious matter that potentially exposes you to substantial damages/attorneys' fees if we are forced to file a lawsuit on behalf of our client. Keep in mind that attorneys' fees include those you will be forced to incur to mount a defense (if any) ***and*** potentially the attorneys' fees/costs we will incur to pursue the matter (which may be awarded) if our client prevails in court. It is important that you are cognizant of that exposure in deciding how to respond to this letter. Assuming our client prevails in court, 17 U.S.C. § 504(c)(1) provides our client the right to recover statutory damages (***for each work that was infringed***) "in a sum of not less than \$750 or more than \$30,000 as the court considers just." Further, if the infringement was committed "willfully," the court may increase the award of statutory damages (***for each work that was infringed***) "to a sum of not more than \$150,000."

Courts in the Eleventh Circuit (which covers Florida,<sup>1</sup> Georgia, and Alabama) have not hesitated (where appropriate) to impose substantial statutory damages against copyright infringers. See, e.g. Reiffer v. World Views LLC, No. 6:20-cv-786-RBD-GJK, 2021 U.S. Dist. LEXIS 38860, at \*11 (M.D. Fla. Mar. 1, 2021) (awarding \$45,000.00 where *single* photograph of Dubai's cityscape was infringed); Corson v. Gregory Charles Interiors, LLC, No. 9:19-cv-81445, 2020 U.S. Dist. LEXIS 142932, at \*14 (S.D. Fla. Aug. 7, 2020) (awarding \$57,600.00 where a *single* photograph was infringed); CCA & B, LLC v. Toy, No. 1:19-CV-01851-JPB, 2020 U.S. Dist. LEXIS 248303, at \*17 (N.D. Ga. Dec. 14, 2020) (awarding \$30,000 for sale of counterfeit goods that infringed plaintiff's copyright). Please keep in mind both that the facts of these cases may be different than those here (thus militating in favor of a higher or lower award here) and that the above amounts do not account for attorneys' fees which are also recoverable under the Copyright Act.

Please note that Section 504 of the Copyright Act provides for the recovery of statutory damages (as explained above) or (at our client's election) actual damages plus "any additional profits of the infringer that are attributable to the infringement and are not taken into account in computing the actual damages." Of course, if forced to litigate this matter, we will fully explore the damages issue and make an election that is most beneficial to our client.

While this is a serious matter, it is not particularly complex. The subject photograph(s) was either properly licensed or it was not. If it was, you should notify us immediately of such licensing so that we may inform our client of such. If it was not properly licensed, then the utilization of our client's work(s) without proper authorization constitutes copyright infringement. In that case, we will either resolve this issue in court (allowing a court to decide the matter) or privately between the parties. If the subject use was not authorized, our client hereby makes the following demand:

***You shall pay Thirty Thousand Dollars (\$30,000.00) within twenty-one (21) days of the date first written above and shall immediately cease and desist from any further use of our client's work(s).***

Please contact us within the above-stated period to either provide evidence of licensing or to arrange for payment. If confirmation of a license or payment is received as described above, we will forego the filing of a lawsuit. Otherwise, please be aware that our client does not shy away from enforcing his rights in court.

---

<sup>1</sup> Our client is a Florida corporation with its principal place of business in Florida. Our client viewed the subject photograph(s) in Florida and, if forced to file a lawsuit, would proceed by filing in the United States District Court for the Southern District of Florida. See, e.g. Vallejo v. Narcos Prods., LLC, No. 1:18-cv-23462-KMM, 2019 U.S. Dist. LEXIS 198109, at \*5 (S.D. Fla. June 14, 2019) ("Copyright infringement is a tortious act, and the Florida long-arm statute confers jurisdiction if the effects of the infringement were felt in the state. Here, it is undisputed that Plaintiff is a resident of Florida, and as such the effects of any alleged copyright infringement would be felt in Florida."); Venus Fashion, Inc. v. Changchun Chengji Tech. Co., No. 16-61752-CIV-DIMITROULEAS/S, 2016 U.S. Dist. LEXIS 194263, at \*6-7 (S.D. Fla. Nov. 2, 2016) ("In cases involving online intellectual property infringement, the posting of an infringing item on a website may cause injury and occur in Florida by virtue of the website's accessibility in Florida, regardless of where the offensive material was posted.") (collecting cases).



Corson v. Gregory Charles Interiors, LLC, No. 9:19-cv-81445, 2020 U.S. Dist. LEXIS 142932, at \*5-7 (S.D. Fla. Aug. 7, 2020) is instructive with respect to your evaluation of the foregoing settlement demand. I encourage you to read the below-quoted text from that case:

Corson believes that the scarcity of this work should also be considered in this Court's evaluation. Corson employed several techniques that she perfected over her career including: "professional strobe lighting to give the photos a polished, yet natural look. Most images were shot on a tripod with custom lighting setups that [Corson's] years of experience shooting homes and interiors has allowed [her] to execute with precision and speed. Selecting the proper lenses and aligning the camera properly is crucial to high-end architectural photography." ECF No. [12-2] at 3. Corson "then spent 2 working days processing the approximately 400 photographs using [her] proprietary adjustments to color, contrast, levels, etc.; selected [her] favorites; made individual adjustments to those 92 files; then submitted them along with dozens of video clips to [her] editor." *Id.* ***The Court finds Corson's request for a scarcity multiplier of four is appropriate to reflect the fair market value of Corson's Work. See Affordable Aerial Photography, Inc. v. VisitWPB.Com, Inc., No. 17-CV-81306-BB, 2018 U.S. Dist. LEXIS 227389, 2018 WL 6519104, at \*2 (S.D. Fla. April 23, 2018) (J. Bloom) (applying a scarcity multiplier of six to an infringed work of photography); Leonard v. Stemtech Int'l, Inc., 834 F.3d 376, 394 (3d Cir. 2016) (affirming a jury verdict of \$1.6 million where the sum included a multiplier of three to five times the benchmark because of the scarcity factor of a stem cell image). Therefore, Corson's actual damages are \$19,200.00 (the licensing fee over two years times a scarcity multiplier of four).***

Corson seeks statutory damages as a result of GCI's willful infringement upon the Work. Willful infringement occurs when the Defendant acts "with 'actual knowledge or reckless disregard for whether its conduct infringed upon the plaintiff's copyright.'" *Arista Records, Inc. v. Beker Enterprises, Inc.*, 298 F. Supp. 2d 1310, 1313 (S.D. Fla. 2003) (J. Cohn) (citing *Original Appalachian Artworks, Inc. v. J.F. Reichert, Inc.*, 658 F. Supp. 458, 464 (E.D.Pa.1987)). Here, Corson sent GCI two notices of its infringement prior to the date this suit was filed. Corson's notice letters, dated April 29, 2019 and June 14, 2019, received no response from GCI. Further, GCI received notice of its infringement when it was served the Complaint in this action. [\*7] ECF No. [1]. ***Notwithstanding prior instances of notice, "this Court may infer that Defendant willfully infringed Plaintiffs' copyrights because of Defendants' default."*** *Arista Records, Inc.*, 298 F. Supp. 2d at 1313 (internal citations omitted). I find that GCI's infringing conduct was willful. ***Accordingly, Corson***

*is entitled to a tripling of her actual damages of \$19,200.00. See Affordable Aerial Photography, Inc., 2018 U.S. Dist. LEXIS 227389, 2018 WL 6519104, at \*2 (finding Defendant's willful infringement entitled the Plaintiff to a trebling of its actual damages); Major Bob Music v. Stubbs, 851 F. Supp. 475, 481 (S.D. Ga. 1994) (plaintiffs' request of statutory damages of an amount approximately three times what the defendant would have paid to be licensed "is a modest, just and appropriate award under section 504(c)(1)"). I thus recommended awarding Corson \$57,600.00 in statutory damages.*

As stated above, the facts and circumstances of each case are different. However, using Corson as an example, please keep in mind that our client exclusively operates on a subscription basis. This means that access to one (1) photograph costs the same as access to the entire library of photographs. Our client makes its library available for \$999.00 per month (<https://preparedfoodphotos.com/featured-subscriptions/>) with a minimum subscription of twelve (12) months <https://preparedfoodphotos.com/terms.of.use.php>. Thus, irrespective of how long you utilized the subject photograph, the *minimum* license fee that would have been owed is \$11,988.00 (\$999.00 x 12 months).

Given the unique nature of our client's work, we believe a scarcity multiplier of 3x – 6x is appropriate, resulting in actual damages of \$35,964.00 - \$71,928.00 (*for each annualized licensing period*). If the infringement is found to be willful, those actual damages would then be trebled (in formulating a statutory damages award) to \$107,892.00 - \$150,000.00 (the maximum allowed for willful statutory damages) (without taking into account any award of costs or prevailing party attorneys' fees).

Further, you should provide a copy of this letter to your general liability insurance carrier (if one exists), notify them of our client's demand, disclose the identity of such insurer to us, and provide a copy of the subject insurance policy to us. If you believe we are mistaken as to the allegations of copyright infringement made herein, then we encourage you to provide us with copies of any license or other evidence supporting your authorized use of the subject work(s).

Finally, while removing the unlicensed photograph(s) from commercial display is required, please understand that *removal alone is insufficient to end this matter*. If your use of the subject photograph is unauthorized, you must contact us to arrange and/or negotiate a payment for your past use. Otherwise, a lawsuit *will* be filed and our client *will* pursue the above-described damages against you.

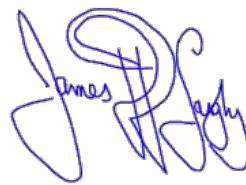
You should give this matter your immediate attention.

Very truly yours,

Very truly yours,

A handwritten signature in blue ink, appearing to read "Daniel DeSouza".

Daniel DeSouza, Esq.  
Shareholder – For the Firm

A handwritten signature in blue ink, appearing to read "James D'Loughy".

James D'Loughy, Esq.  
Shareholder – For the Firm

Encl.

**Exhibit “A”**





This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

*Karen Leigh Clayton*

Acting United States Register of Copyrights and Director

Registration Number

**VA 2-022-602**

Effective Date of Registration:

November 18, 2016

## Title

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**Title of Work:** ADLIFE-COLLECTION-111616

**Previous or Alternate Title:** Group registration of photos published 01-09-1994 through 12-05-1994; about 220 photos total.

**Content Title:** AntipastoPlatterHR0505, 05-24-1994;  
ArtisanalBreadsHR0508, 11-23-1994;  
BirthdayCakeHR0405, 08-12-1994;  
BirthdaySheetCakeHR0611, 03-23-1994;

BoneInBarbecueRibsHR0612, 10-20-1994;  
BuffaloChickenWingsHR0606, 08-21-1994;  
BuffaloWingsHR0602, 04-23-1994;  
CalzoneHR0402, 10-14-1994;

CauliflowerBroccoliHR0609, 06-11-1994;  
ChickenCesarWrapsHR0605, 07-21-1994;  
BeefEyeRoundRoast010, 08-05-1994;  
ChickenPiecesHR0612, 08-27-1994;

ClementinesHR0408, 07-05-1994;  
ClubSandwichHR0604, 09-05-1994;  
CranberrySauceHR0506, 09-05-1994;  
CroissantRollsHR0404, 05-17-1994;

FootballLayerCakeHR0608, 01-13-1994;  
FootballSheetCakeHR0608, 05-08-1994;  
FreshBasilHR0501, 12-05-1994;  
FriedChickenHR0508, 03-05-1994;

FriedMozzarellaSticksHR0502, 06-12-1994;  
FriedPotatoSkins0404, 03-09-1994;  
FruitBasketHR0512, 03-14-1994;  
FruitPlateHR0505, 02-24-1994;

GrapefruitHR0610, 11-13-1994;  
GreenBellPeppersHR0601, 04-17-1994;  
HamburgersOnBunsHR0603, 07-11-1994;  
HoneyHam0311, 06-19-1994;

KaiserRollsHR0604, 03-20-1994;  
Lobster2HR0609, 09-25-1994;  
LobsterHR0512, 05-24-1994;

MacaroniSaladHR0610, 05-15-1994;

MangosHR0612, 07-05-1994;  
MeatloafHR0510, 08-21-1994;  
MeatloafPastalHR0508, 09-15-1994;  
MozzarellaSticksHR0504, 08-25-1994;

OrangesHR0609, 07-27-1994;  
PartyPlatterMeatCheeseHR0612, 06-18-1994;  
PartyPlatterShrimpHR0612, 08-05-1994;  
PeachesHR0503, 05-15-1994;

PizzaHR0608, 01-16-1994;  
PorkShoulderCookedHR0601, 07-21-1994;  
RibRoastCookedHT0512, 07-05-1994;  
RisottoHR0605, 02-17-1994;

RoastBeefSandwichHR0609a, 07-10-1994;  
RomaineHeartsHR0604, 07-09-1994;  
ShrimpCocktailHR0402, 09-14-1994;  
SlicedDeliMeatCheeseHR0611, 08-26-1994;

Soda2HR0605, 08-17-1994;  
SpiralHamCookedHR0410a, 05-21-1994;  
Strawberries0411, 06-05-1994;  
SubmarineSandwichesJR0501, 11-11-1994;

SubmarineSandwichHR0611, 10-22-1994;  
VegetableTrayHR0605, 06-11-1994;  
VeggiePlatterHR0511, 04-15-1994;  
WhiteMushrooms0409a, 06-05-1994;

BeefBottomRoundRoast001, 12-05-1994;  
BeefBottomRoundRoast002, 08-20-1994;  
BeefBottomRoundRoast003, 01-09-1994;  
BeefBottomRoundRoast004, 08-20-1994;

BeefBottomRoundRoast005, 08-20-1994;  
BeefBottomRoundRoast006, 11-23-1994;  
BeefBottomRoundRoast007, 04-15-1994;  
BeefBottomRoundRoast008, 11-16-1994;

BeefBottomRoundSteak001, 11-05-1994;  
BeefBottomRoundSteak002, 08-16-1994;  
BeefBottomRoundSteak003, 02-27-1994;  
BeefButtRoast001, 08-16-1994;

BeefChuckRoast7Bone001, 08-20-1994;  
BeefChuckRoastBnls001, 04-05-1994;  
BeefChuckRoastBnls002, 08-20-1994;  
BeefChuckRoastBnls003, 10-05-1994;

BeefChuckRoastBnls004, 03-20-1994;  
BeefChuckRoastBnls005, 05-22-1994;  
BeefChuckRoastBnls006, 04-24-1994;  
BeefChuckRoastBnls007, 02-19-1994;



BeefChuckRoastBnls008, 10-09-1994;  
BeefChuckRoastBnls009, 04-24-1994;  
BeefChuckRoastBnls010, 09-18-1994;  
BeefChuckRoastBnls011, 06-05-1994;

BeefChuckRoastBnls012, 01-11-1994;  
BeefChuckRoastBnls013, 07-23-1994;  
BeefChuckRollSteak001, 05-08-1994;  
BeefChuckSteak7Bone001, 08-26-1994;  
BeefChuckSteak7Bone002, 08-20-1994;  
BeefChuckSteak7Bone003, 06-05-1994;

BeefChuckSteakBnIn001, 08-20-1994;  
BeefChuckSteakBnls001, 08-20-1994;  
BeefChuckSteakBnls002, 08-20-1994;  
BeefChuckSteakBnls003, 02-16-1994;  
BeefChuckSteakBnls004, 03-20-1994;

BeefChuckSteakBnls005, 05-05-1994;  
BeefChuckSteakBnls006, 02-26-1994;  
BeefChuckSteakBnls007, 12-05-1994;  
BeefChuckSteakBnls008, 02-27-1994;

BeefChuckSteakTip001, 11-22-1994;

BeefChuckSteakTip002, 11-22-1994;  
BeefCowFeet001, 07-23-1994;  
BeefCowFeet002, 05-05-1994;  
BeefCowFeet003, 02-05-1994;  
BeefCowFeet004, 02-05-1994;  
BeefCubeSteak001, 08-16-1994;  
BeefCubeSteak002, 08-16-1994;  
BeefCubeSteak003, 08-16-1994;

BeefCubeSteak004, 09-10-1994;  
BeefCubeSteak005, 04-24-1994;  
BeefCubeSteak006, 05-05-1994;  
BeefCubeSteak007, 12-05-1994;

BeefCubeSteak008, 04-24-1994;  
BeefCubeSteak009, 11-16-1994;  
BeefCubeSteak010, 11-16-1994;  
BeefCubeSteakPan001, 09-25-1994;  
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BeefEyeRoundRoast003, 08-16-1994;  
BeefEyeRoundRoast004, 08-16-1994;  
BeefEyeRoundRoast005, 08-16-1994;  
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BeefEyeRoundRoast007, 08-16-1994;  
BeefEyeRoundRoast008, 10-20-1994;  
BeefEyeRoundRoast009, 11-05-1994;  
BeefRumpBackRoast001, 08-20-1994;  
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BeefRumpRoast002, 05-05-1984;

BeefRumpRoast003, 04-05-1994;  
BeefRumpRoast004, 08-24-1994;  
BeefRumpRoast005, 08-24-1994;  
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BeefSpoonRoast001, 09-05-1994;  
BladeSteak001, 09-05-1994;  
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CornedBeefBrisketFlat002, 09-05-1994;  
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RollWheatBasket001, 07-24-1994;  
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CornedBeefBrisketFlat007, 02-27-1994;  
CornedBeefBrisketFlat008, 03-25-1994;

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PiePumpkin002, 08-05-1994;  
PiePumpkin003, 08-05-1994;  
PiePumpkin004, 08-05-1994;  
PiePumpkin005, 08-05-1994;

PiePumpkin006, 08-05-1994;  
PiePumpkin007, 09-05-1994;  
PiePumpkin008, 11-09-1994;  
PiePumpkin009, 08-05-1994;

PiePumpkin010, 09-25-1994;  
PiePumpkin011, 07-15-1994;  
PiePumpkin012, 03-25-1994;  
PiePumpkin013, 08-05-1994;

PiePumpkinSlice001, 01-15-1994;  
PiePumpkinSlice002, 01-15-1994;  
PiePumpkinWhole001, 11-16-1994;  
PieRaspberry002, 08-05-1994;

PieStrawberry001, 05-05-1994;  
PieStrawberry002, 08-05-1994;  
PieStrawberry005, 08-05-1994;  
PieStrawberrySlice001, 11-16-1994;

PieSweetPotato001, 11-15-1994;  
PieVanillaCream001, 08-05-1994;  
RollAsst001, 11-27-1994;  
RollAsstBasket001, 08-05-1994;  
RollAsstBasket002, 08-05-1994;





RollAsstBasket003, 08-05-1994;  
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RollAsstBasket006, 07-05-1994;

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RollButtermilkBiscuits002, 08-05-1994;  
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RollDinner001, 11-05-1994;  
RollDinner002, 08-05-1994;  
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RollHamburger001, 06-26-1994;  
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RollHamburgerBasket002, 08-05-1994;  
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RollItalian003, 01-21-1994;

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RollPortugese001, 05-05-1994;  
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RollPortugueseBasket002, 06-11-1994;  
RollPretzel001, 07-05-1994;

RollPretzel002, 07-05-1994;  
RollScaliBasket001, 04-05-1994;  
RollSesame001, 11-05-1994;  
RollSnowflake001, 08-05-1994;

RollSnowflakeBasket001, 08-05-1994;  
RollSteak001, 07-14-1994;  
RollSub001, 08-05-1994;  
RollSubBasket001, 08-05-1994;

RollTorpedo001, 05-20-1994;  
RollTorpedoBasket001, 05-15-1994;  
RollVienna001, 08-05-1994;  
RollWheat002, 07-24-1994.

## Completion/Publication

**Year of Completion:** 1994  
**Date of 1st Publication:** January 09, 1994  
**Nation of 1<sup>st</sup> Publication:** United States

## Author

- **Author:** Adlife Marketing & Communications Co., Inc, Employer-for-Hire of Joel Albrizio  
**Author Created:** photograph  
**Work made for hire:** Yes  
**Domiciled in:** United States

## Copyright Claimant

**Copyright Claimant:** Adlife Marketing & Communications Co., Inc.  
38 CHURCH ST, PAWTUCKET, RI, 02860-3906, United States

0000VA00020226020504\*

## **Rights and Permissions**

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**Organization Name:** SHORES & OLIVER, PC  
**Name:** Milton M. Oliver. Esq.  
**Email:** milton.oliver@shoresoliver.com  
**Telephone:** (774)521-3058  
**Alt. Telephone:** (781)910-9664  
**Address:** PO BOX 790  
COTUIT, MA 02635-0790 United States

## **Certification**

---

**Name:** MILTON M. OLIVER, Esq.  
**Date:** November 18, 2016  
**Applicant's Tracking Number:** 873-057-322

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**Exhibit “B”**



[Dry Lakes Ranch Beef](#)
[Home](#)
[In the News](#)
[Know Our Cattle](#)
[Know Your Rancher](#)
[More](#)

Log In

[Home](#) / [Boneless Chuck Roast \(3 sizes available\)](#)

## Boneless Chuck Roast (3 sizes available)

Size

Select

Quantity

1

[Contact Us to Purchase](#)

[More Information](#)
[Nutrition](#)
[Freshne](#)

Hand cut from the front shoulder, this staple pot roast includes the perfect amount of beautiful marbling and lean muscle. When cooked appropriately, the meat becomes extremely tender and juicy from the rendered specks of marbling dotting the roast. Connective tissues in the roast also melt during cooking and become self-basting, adding even more moisture and flavor to this roast.

- 14-day aged to maximize tenderness, yet retain mellow flavor
- Hand carved from our grain-fed, Dry Lakes Ranch beef
- Flash-frozen and individually sealed for perfection
- No antibiotics or hormones
- BQA Certified - Dry Lakes Ranch is Beef Quality Assurance Certified

Sold by the pound, boneless Chuck Roasts are tender, flavorful, and moist. Our 3-4, 7-8, and 10-12 pound chuck roasts are hand selected and hand-trimmed. The larger roasts are perfect for family gatherings! Simply place in a roasting dish or turkey roaster, cook on a low temp for 10-12 hours, and you will have the juiciest and most tender beef roast this side of the Mississippi! This is the cut you'll want to order when you are looking for a perfect, no-fail pot roast!

RELATED PRODUCT

\$5.69/lb.

Beef Short Rib: Whole or Singles

\$8.99/lb.

Beef Short Rib Singles

\$7.99/lb.

Brisket: 2 sizes

\$5.99/lb.

1 Pound 75/25 Ground Beef

OUR STORE

**Address:**  
 73 North Main Street  
 P.O. Box 1561  
 Parowan, Utah 84761

**Phone:**  
 (435)559-1561

**Email:**  
[DryLakesRanchBeef@gmail.com](mailto:DryLakesRanchBeef@gmail.com)

OPERATING HOURS

**-REGULAR HOURS-**  
 Monday: 11am - 7pm  
 Tuesday: Closed  
 Wednesday: Closed  
 Thursday: 11am - 7pm  
 Friday: 11am - 7pm  
 Saturday: 11am - 7pm  
 Sunday: 11am - 4pm

**-HOLIDAY HOURS-**  
 Saturday (CHRISTMAS DAY): CLOSED  
 Sunday: 11am - 4pm  
 Monday: 11am - 7pm  
 Tuesday: Closed  
 Wednesday: Closed  
 Thursday: 11am - 7pm  
 Friday (NEW YEAR'S EVE): 11am - 5pm  
 Saturday (New Years DAY): 11am - 7pm  
 Sunday: 11am - 4pm

UPDATED October 28, 2021

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<https://www.drylakesranchbeef.com/product-page/boneless-chuck-roast>

